



Privacy Impact Assessment (PIA) Template

FHFA.GOV

(Name of the Information System or Information Collection)

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Date

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System/Collection Owner(s)			
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Executive Sponsor			
Name	E-mail	Division/Office	Office or Mobile Phone Number
System/Collection Overview			
<p>“FHFA.gov Online Forms” (FHFA.gov) is an existing system that is owned by the Office of Congressional Affairs and Communications (OCAC) and contains information submitted by individuals or their representatives, to FHFA. FHFA.gov uses Drupal, a content management open-source software to develop, organize and facilitate content creation, including the online forms. It also uses Acquia as the hosting provider for Drupal, which is utilized as a Platform as a Service (PAAS) model operating out of FHFA’s Amazon Web Services (AWS) Virtual Private Cloud (VPC). The online forms are utilized by individuals who contact FHFA with questions, comments, to file a complaint or appeal, to request or provide information, to request consumer assistance, to respond to a proposed rule, or who wish to conduct business with FHFA. FHFA will use the information contained in this system to communicate with individuals who submit a form online with FHFA.</p> <p>The system contains the following information about individuals who submit a form on FHFA’s website: name, address, telephone number, fax number, email address, property information, borrower information, organization name and type, government agency name and type, job position, and representative of submitter; correspondence and records of communication between FHFA and individuals submitting information, including copies of supporting documents; information regarding a company wishing to do business with FHFA (<i>i.e.</i>, company name, address, telephone number, website address, description of supplies or services offered, years of experience, Data Universal Numbering System (DUNS®) Number, Unique Entity Identifier (UEI) Number, U.S. General Services Administration (GSA), NAICS Code and Governmentwide Acquisition Contracts (GWAC) number, organization affiliations, special category status, and past performance references), and related information.</p>			

Section 1.0 Characterization of the Information

The following questions define the scope of the information requested and/or collected as well as reasons for its collection as part of the System/Collection being procured or developed. The questions address all information collected, with emphasis on the collection of PII, such as name, address, social security number, date of birth, financial information, etc.

#	Question	Response
1.1	What information types (e.g., contact information, demographic information, employment information) are being collected, used, disseminated, or maintained in the System/Collection?	Records contain the following contact information for individuals who submit a form on FHFA’s website: Name, address, telephone number, fax number, email address, property information, borrower information, organization name and type, government agency name and type, job position,

		and representative of submitter; correspondence and records of communication between FHFA and individuals submitting information, including copies of supporting documents; information regarding a company wishing to do business with FHFA (<i>i.e.</i> , company name, address, telephone number, website address, description of supplies or services offered, years of experience, Data Universal Numbering System (DUNS®) Number, Unique Entity Identifier (UEI) Number, U.S. General Services Administration (GSA), NAICS Code and Governmentwide Acquisition Contracts (GWAC) number, organization affiliations, special category status, and past performance references), and related information.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	Individuals who contact FHFA with questions, comments, to file a complaint or appeal, to request or provide information, to request consumer assistance, to respond to a proposed rule, or who wish to conduct business with FHFA.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	FHFA uses the records in this system to communicate with individuals who submit a form online with FHFA. The forms allow FHFA to respond to complaints, appeals, inquiries and requests for information; to review and post comments on proposed rules/regulations; to review feedback received on FHFA proposed or implemented initiatives; and to compile a list of potential vendors and contractors. The forms also assist FHFA and those who will respond to the submitter with consumer issues involving Fannie Mae, Freddie Mac, and the Federal Home Loan Banks.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	Information is input by individuals on FHFA.gov via the online forms available at: https://www.fhfa.gov/AboutUs/Contact .
1.5	<p>Are Social Security Numbers (SSNs) being collected or used in the System/Collection?</p> <ul style="list-style-type: none"> • If yes, describe in detail: <ol style="list-style-type: none"> 1) The business justification for collecting or using SSNs; 2) The consequences if SSNs are not collected or used; and 3) How the SSNs will be protected while in use, in transit and in storage. • If no, state “N/A” in the response section. 	N/A

Section 2.0 Uses of the Information

The following questions delineate the use of information.

#	Question	Response
2.1	How will the information be used and for what purpose?	FHFA uses the records in this system to communicate with individuals who submit a form online with FHFA. The forms will allow FHFA to respond to complaints, appeals, inquiries and requests for information; to review and post comments on proposed rules/regulations; to review feedback received on FHFA proposed or implemented initiatives; and to compile a list of potential vendors and contractors. The forms will also assist FHFA and those who will respond to the submitter with consumer issues involving Fannie Mae, Freddie Mac, and the Federal Home Loan Banks.
2.2	Describe any types of measures or processes in place to ensure that information is only used in the manner for which it was collected.	Records are maintained in electronic format and stored in a computerized database. Computerized records are safeguarded through use of access codes and other information technology security measures. Access to the records is restricted to those who require the records in the performance of official duties related to the purposes for which the system is maintained.

Section 3.0 Retention

The following questions outline how long information will be retained after the initial collection.

#	Question	Response
3.1	How long is the information retained?	Content submitted via FHFA.gov is owned by business unit offices – so retention schedules vary.
3.2	Has a retention schedule been approved by FHFA's Records Management Office and National Archives and Records Administration (NARA)? If yes, provide the corresponding General Record Schedule (GRS) or FHFA specific Records Schedule number.	<p>Yes, (general) web content retention is addressed in OCAC's 2023 File Plan (5.5b: Web Content), which is available at https://intranet.fhfa.gov/downloader.ashx?objectid=8490398. Records are considered temporary and are destroyed or deleted three (3) years after cutoff, which is annually.</p> <p>OCAC owns the FHFA.gov system/structure, however, content within the topical databases is owned by respective business units and acted upon, captured and/or retained per respective office/division file plans.</p>

Section 4.0 Notice, Access, Redress and Correction

The following questions are directed at notice to the individual, the individual’s right to consent to uses of the information, the individual’s right to decline to provide information, and the individual’s ability to ensure the accuracy of the information collected about them.

#	Question	Response
4.1	<p>Is the information in this System/Collection retrieved by an individual’s name or personal identifier such as an SSN or other identification?</p> <ul style="list-style-type: none"> • If no, please put “no” in the Response section. • If yes, the System/Collection will need to be covered by a Privacy Act System of Records Notice(s) (SORN(s)). Please provide the SORN(s) name and number or indicate that a SORN is in progress. 	<p>Yes. SORN, FHFA-22, Online Forms (published in the Federal Register on 11/6/2013) applies to this system. FHFA-22 is available at: 2013-26574.pdf (govinfo.gov)</p>
4.2	<p>How is notice about the collection of PII provided to individuals prior to the collection for the System/Collection (e.g., direct notice, Privacy Act Statement or public notice, SORN)? If notice is not provided, explain why not.</p>	<p>Every form on FHFA.gov has a Privacy Act Statement.</p>
4.3	<p>Is an individual’s response to the request for information voluntary or mandatory?</p>	<p>Voluntary.</p>
4.4	<p>What are the consequences if an individual declines to provide the information?</p>	<p>Although providing the information is voluntary, failure to provide the requested information may result in the submitter’s complaint, appeal, inquiry, request, comment, or feedback not being processed and may make it more difficult for FHFA to respond to the submitter.</p>
4.5	<p>What are the procedures that allow individuals to gain access to their information?</p>	<p>Individuals can direct requests for access to their information to the Privacy Act Officer in accordance with the SORN and FHFA’s Privacy Act Regulation, 12 CFR 1204.</p>
4.6	<p>What are the procedures for correcting inaccurate or erroneous information?</p>	<p>Individuals can direct requests to correct inaccurate or erroneous information to the Privacy Act Officer in accordance with the SORN and FHFA’s Privacy Act Regulation, 12 CFR 1204.</p>

Section 5.0 Sharing and Disclosure

The following questions define the content, scope, and authority for information sharing.

#	Question	Response
5.1	<p>Is information shared with internal office(s) or division (s)?</p> <ul style="list-style-type: none"> • If yes, please identify the FHFA office(s) or division(s) and describe the information shared and for what purpose. • If no, please state “N/A” in the response section. 	<p>Access varies by form and on a case-by-case basis. “Homeowner Assistance” requests are handled by OCAC Consumer Assistance team and may be shared with Ombudsman, and/or appropriate business offices. “Data and Research” requests are directed to specific offices that handle particular regulated entities and/or research. “Doing Business with Us” is managed by Office of Minority and Women Inclusion (OMWI) and may be shared with Office of Budget and Financial Management (OBFM), Contracting Office and Office of General Counsel (OGC), accordingly. “General Questions or Comments” are shared with appropriate business offices depending on the subject matter. “Input on Topic” is shared with respective business offices depending on the topic (case-by-case). “Mortgage Translations” assistance is shared by team leads with appropriate teams/offices who might best address the requests/inquiries.</p>
5.2	<p>Is information shared with external (outside FHFA) agencies, organizations, contractors, or other entities? For purposes of this Section, external organization(s) include Federal, state, and local government, and the private sector.</p> <ul style="list-style-type: none"> • If yes, please identify the information shared, and for what purpose. • If no, skip to Section 6. 	<p>Some form submissions are posted to publicly viewable areas of FHFA.gov immediately without redaction. The form submissions that are not specifically public, depending on the subject matter, may be shared with regulated entities (Fannie Mae, Freddie Mac, or Federal Home Loan Banks), FHFA OIG, HUD, Treasury, or other regulatory agencies, members of Congress, or others as appropriate per SORN, FHFA-22 and the routine uses identified or incorporated by reference therein.</p>
5.3	<p>Is the sharing of PII outside the agency compatible with the stated purpose of the original information collection?</p> <ul style="list-style-type: none"> • If yes and a SORN applies, identify the applicable routine uses in the SORN listed in Question 4.1. • If no and/or a SORN does not apply, identify the legal authority that permits the sharing outside FHFA. 	<p>Yes. See SORN, FHFA-22 and the routine uses expressly stated or incorporated by reference therein.</p>

Section 6.0 Technical Access and Security

The following questions describe technical safeguards and security measures.

#	Question	Response
6.1	<p>Will FHFA Office of Inspector General (OIG) or non-FHFA personnel (e.g., contractor personnel, regulated entity personnel) have access to the System/Collection and information contained therein?</p> <ul style="list-style-type: none"> • If yes, how will they gain access to the System/Collection? • If no, how will the agency control access to and use of that information? • Are there procedures or criteria documented in writing? If so, please describe. 	<p>Yes, on occasion contractor personnel will need to access information to export/share with owner offices or to correct and/or approve submissions prior to publication on FHFA.gov website. Access is provided to individuals selected by owner offices upon request from appropriate managers and/or content owners.</p> <p>User access for contractor and FHFA staff is controlled through internal control access procedures. Best practices follow the principle of “least privilege.” Users are given the lowest permission levels they need to perform their assigned tasks.</p> <p>Relevant procedures currently in place are described in FHFA.gov and FHFA Intranet Posting and Maintenance Procedures.</p>
6.2	<p>Are there any conflicts of interest with respect to the System/Collection or information? If so, identify the conflicts of interest and describe how they are addressed.</p>	<p>No.</p>
6.3	<p>Describe the type and frequency of training that is provided to users that is specifically or generally relevant to the System/Collection.</p>	<p>When new forms are added to FHFA.gov (or new topics, under the Request for Information form), respective topic owner/users are given access to submissions and are notified by the system when comments/input are submitted via FHFA.gov. Individuals are trained by OCAC to access, review and approve input when needed.</p> <p>In addition, all FHFA employees are required to undergo Security, Privacy, and Records and Information Management (RIM) training at new employee onboarding training and annually thereafter. The training assures that users are aware of appropriate procedures regarding records and information that is available on FHFA.gov. In addition, all FHFA users with elevated privileges receive specialized security training, and role-based privacy awareness training.</p>
6.4	<p>Describe the technical/administrative safeguards in place to protect the data.</p>	<p>Data submitted in online forms is stored in Drupal, which is accessible only by authorized members of OCAC based on their need to know the specific information being accessed. Access is restricted using Drupal access control groups,</p>

		<p>administered by the FHFA.gov system owner.</p> <p>User access for contractor and FHFA staff is controlled through internal control access procedures. Best practices follow the principle of “least privilege.” Users are given the lowest permission levels they need to perform their assigned tasks.</p>
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Section 7.0 Risk

The following questions describe the risk to the information within the System or Collection.

#	Question	Response
7.1	<p>Given the amount and type of information collected, what are the risks to an individual’s privacy associated with collection of the data? Explain in detail how the loss or compromise of the information will/can affect an individual’s privacy and describe how these risks are mitigated.</p>	<p>Risk of loss, identity theft, and data integrity are the risks to an individual’s privacy associated with the collection of the data. Actions to mitigate these risks include limiting the collection of information to only that which is necessary to accomplish the purpose of the collection (and, if applicable, deleting any information received that is not needed for that specific purpose in according with recordkeeping requirements); limiting access to personally identifiable information (PII) to only those with a business need-to-know; and/or any measures taken to prevent any interfacing or commingling of data with other FHFA systems.</p>
7.2	<p>Discuss the risks associated with the length of time data is retained and how those risks are mitigated.</p>	<p>Risk of loss, identity theft, data integrity, and misuse or inadvertent disclosure are the risks associated with the length of time the data is retained. Mitigation of the identified risks include limiting access to PII to only those with a business need-to-know; measures taken to prevent any interfacing or commingling of data with other FHFA systems; any data loss prevention (DLP) tools in place to prevent loss or misuse of PII; and/or archiving or destroying PII when it no longer serves a business purpose, in conformity with the applicable retention schedule.</p>
7.3	<p>Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.</p>	<p>Possibility of loss of control, identity theft, data integrity, and misuse or inadvertent disclosure are mitigated by FHFA network security protocols. Mitigation of the identified risks can be addressed by ensuring provisions in the applicable contract or inter agency agreement (IAA) protect the PII and FHFA’s rights/ obligations with respect to that PII; limiting the PII to be shared to only that which is required to accomplish the contractual/IAA purpose of sharing that PII; and/or limiting, via the applicable</p>

		contract or IAA or otherwise, the sharing of/access to PII to only those external persons or entities who have a business need-to-know.
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