Privacy Impact Assessment (PIA) Template

<u>**AFFORDABLE HOUSING PROGRAM, COMMUNITY INVESTMENT**</u>
<u>**PROGRAM, COMMUNITY INVESTMENT CASH ADVANCE SYSTEM**</u>
<u>**(AHP CIP/CICA SYSTEM)**</u>
(Name of the Information System or Information Collection)

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Date

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System/Collection Overview			

The Affordable Housing Program (AHP), Community Investment Program (CIP), and Community Investment Cash Advance (CICA) Program System (AHP CIP/CICA System) is an existing system developed by the Federal Housing Finance Agency (FHFA) that collects information from the Federal Home Loan Banks (FHLBanks).

The FHLBanks administer three housing and community economic development programs: AHP, CIP, and CICA programs, which expand homeownership and rental opportunities for low or moderate-income households and provide financing for community and economic development projects. Each FHLBank is required to collect and report data related to the AHP and other community investment programs to FHFA. Affordable housing data include funding commitments and disbursements, and key housing production and household beneficiary characteristics. Economic development and community investment projects data include funding commitments, project type and project beneficiary characteristics.

The information in this system is collected from the FHLBanks; is reviewed, stored, and used by FHFA; and is available in raw form to the FHLBanks via a system download. All FHLBanks are permitted to download information from any FHLBank; however, the AHP Competitive Application Program project address information is removed.

The information is collected to monitor the effectiveness and efficiency of the affordable housing and community investment programs as required by regulation.

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?	The AHP CIP/CICA System collects addresses of housing projects. The information reported by the FHLBanks are sponsor addresses for various projects including single family and multi-family projects and are in varying detail (e.g., street address, zip code only, city only, etc.). The FHLBanks do not report the

#	Question	Response
		address of individual households to FHFA.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The FHLBanks are the sources of the collected and reported information as required by the Data Reporting Manual (DRM) and FHFA regulations.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The information is collected to comply with the Federal Home Loan Bank Act (12 U.S.C. § 1430(i) and (j)), AHP Regulation 12 C.F.R. part 1291 and CICA Regulation 12 C.F.R. part 1292 and to monitor the effectiveness and efficiency of the affordable housing and community investment programs.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The FHLBanks collect data and submit it to FHFA via a web-based application by file uploads via the FHFA Nextranet.
1.5	Are Social Security Numbers (SSNs) being collected or used in the System/Collection? • If yes, describe in detail: 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's Division of Bank Regulation (DBR) has established four primary uses of the AHP, CIP, and CICA programs data: 1) To measure the FHLBanks AHP, CIP, and CICA performance and results; 2) To determine the FHLBanks' compliance with the AHP, CIP, and CICA programs statutes and regulations; 3) To use for policy guidance, development and decision-making; and 4) To fulfill reporting requirements to FHFA, the Administration, Congress and external stakeholders.

#	Question	Response
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.	The FHLBanks are required to complete an access control form that is reviewed and approved by FHFA prior to granting system access to FHLBank users. Only approved and authorized users are permitted access to the AHP CIP/CICA System via FHFA's Nextranet.

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?	Transactional history is retained for 30 years.
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.	Yes. This system is covered by *FHFA's Comprehensive Records Schedule* **Item 2.3b: Mission-related systems** - data gathered and maintained for internal FHFA analysis and business purposes, and that are not released to the public due to the sensitive nature of the information, including the records that document the development and operation of the systems within which that data is contained. **Disposition: TEMPORARY.** Cutoff after system is retired. Destroy or delete 30 years after cutoff.

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	Is the information in this System/Collection retrieved by an individual's name or personal identifier such as an SSN or other identification? • 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.	No.
4.2	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.	Notice is not provided because this System is not the original point of collection and does not obtain the information directly from individuals.

#	Question	Response
4.3	Is an individual's response to the request for information voluntary or mandatory?	N/A
4.4	What are the consequences if an individual declines to provide the information?	N/A
4.5	What are the procedures that allow individuals to gain access to their information?	N/A
4.6	What are the procedures for correcting inaccurate or erroneous information?	N/A

Section 5.0 Sharing and Disclosure

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

#	Question	Response
5.1	Is information shared with internal office(s) or division (s)? • 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.	Yes. While DBR is the system owner of the AHP CIP/CICA System, the Division of Housing Mission and Goals (DHMG) is the owner of the data, as it is used for supervision purposes.
5.2	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. • If yes, please identify the information shared, and for what purpose. • If no, skip to Section 6.	Yes. Data related to the AHP, CIP and CICA programs is shared with and between the FHLBanks pursuant to a joint agreement between DBR and the FHLBanks. The data shared does not include PII.
5.3	Is the sharing of PII outside the agency compatible with the stated purpose of the original information collection? • 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.	N/A

Section 6.0 Technical Access and Security

The following questions describe technical safeguards and security measures.

#	Question	Response
6.1	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? • 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.	Access is limited to FHLBank reporters and FHFA designated staff. The FHLBanks are required to complete an access control form that is reviewed and approved by the FHFA prior to granting system access. Only approved and authorized users are permitted to access the AHP CIP/CICA System.
6.2	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.	No.
6.3	Describe the type and frequency of training that is provided to users that is specifically or generally relevant to the System/Collection.	All FHFA employees are required to undergo Security, Privacy, and Records and Information Management (RIM) training at new employee onboarding training and annually thereafter. In addition, all FHFA users with elevated privileges receive specialized security training, and role-based privacy awareness training for those individuals whose work duties and responsibilities involve the collection, use, storage, access, or maintenance of PII. Finally, users are provided an initial login walk through to ensure they can access the system. User Manuals and Guides are contained within the application.
6.4	Describe the technical/administrative safeguards in place to protect the data.	The AHP CIP/CICA System resides on FHFA's General Support System (GSS) and is protected by the safeguards described in the FHFA GSS System Security and Privacy Plan (SSPP) and the GSS PIA. These safeguards include, but are not limited to, role-based access controls that restrict access to information based on Active Directory groups and permissions, auditing of file access and modification, data encryption, etc. The FHFA GSS is in the ongoing authorization phase of the Risk Management Framework and undergoes annual control assessments and reauthorization consistent with the Risk Management Framework. The AHP CIP/CICA System is also included in the DBR External Reporting System boundary.

Section 7.0 Risk

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

#	Question	Response
7.1	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.	The AHP CIP/CICA System does not contain PII, however, the address of the AHP project could potentially be linked to an individual by using address information in the system. This risk is mitigated by FHFA's removal of the AHP competitive application program project address information prior to the FHLBanks' review and use of the data.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	There are no risks associated with the length of time data is retained. Only transactional data is retained for transactional history purposes only.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	Since the system does not contain PII, the privacy risks to the individual are minimal. Further, FHFA removes the AHP competitive application program project address information prior to sharing the data with the FHLBanks.