



Privacy Impact Assessment (PIA) Template

TRANSIT BENEFIT SYSTEM

(Name of the Information System or Information Collection)

October 2024

Date

Tasha L. Cooper
Senior Agency Official for Privacy
(202) 649-3091

Tasha.Cooper@FHFA.gov

System/Collection Owner(s)			
Name	E-mail	Division/Office	Office or Mobile Phone Number
Stephanie Beavers	Stephanie.Beavers@fhfa.gov	OFOM	202-649-3940
Erica Jones	Erica.Jones@fhfa.gov	OHRM	202-649-3252
Executive Sponsor			
Name	E-mail	Division/Office	Office or Mobile Phone Number
Jason Donaldson	Jason.Donaldson@fhfa.gov	OFOM	202-649-3389
Monica Matthews	Monica.Matthews@fhfa.gov	OHRM	202-649-3374
System/Collection Overview			
<p>The Transit Benefit System is an existing intranet portal that: (1) allows employees to submit requests for parking and public transportation benefits, (2) enables benefit administrators to assess employee eligibility and to approve/disapprove requests, and (3) maintains the status of transit benefits currently being received.</p> <p>The system provides FHFA employees transit benefits, such as parking and public transportation for the fiscal year. The parking benefits offered are either a temporary or permanent building parking permit at FHFA Headquarters (HQ), Constitution Center, Washington, D.C. The public transportation benefits are offered as Metro or Commuter transportation benefits.</p> <p>The system allows for access and approval authority for both parking and public transportation requests. This system allows parking and transportation benefit administrators, based on their access level, to view and produce reports of who has applied for and received transportation and parking benefits. The system also maintains a list of the personnel who administers the programs and permits the addition and removal of personnel to administer both transit benefits.</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?	The system collects the following information from FHFA employee' applications for transit benefits: name, employment status, work duty station, phone number, email address, SmarTrip card number, and type of request (e.g., permanent or temporary parking). The system also collects the names (and the name of their federal agency

		if applicable) of visitors requesting visitor parking at FHFA HQ.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The sources of the information are the FHFA employee's application for benefits submitted online, employee data obtained from FHFA's Human Resource Information System (HRIS), and employees who input visitor information into the portal for official visitor parking.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The information is used to administer the FHFA transit subsidy benefits program, including updating the Washington Metropolitan Area Transit Authority (WMATA) system, which provides the actual benefit to the employee; to administer the parking program, including the allocation of parking spaces among employees and visitors; to facilitate the formation of carpools with employees who have been issued parking permits; and to provide for the safe use of FHFA facilities.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The information is taken from the transit benefits system application submitted by the employee for benefits, from the employee arranging for official visitor parking, and through an interface with the HRIS system.
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?	The information will be used to (1) allow eligible employees to submit requests for parking and public transportation benefits, (2) enable benefit administrators to assess, approve or deny, modify, or discontinue benefits, and (3) maintain the status of transit benefits currently being received.

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.	Access is limited to only the System Owner, System Administrator, Parking Manager Administrator, Transit Benefit Administrator, and authorized Office of Facilities and Operations Management (OFOM), Office of Human Resources Management (OHRM) and Office of Technology and Information Management (OTIM) personnel who needs access to the system in order to perform job duties.
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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?	Administrative records are maintained for 3 years after employee participation concludes and individual case records are maintained for 2 years after employee participation concludes.
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. Records are scheduled in NARA’s General Record Schedule (GRS) 2.4.130 and 2.4.131.

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. 	Yes. SORNs FHFA-11, Transit Subsidy Program Records, 76 Fed. Reg. 33293 (June 8, 2011) and FHFA-12, Parking Program Records, 76 Fed. Reg. 33294 (June 8, 2011).
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.	A Privacy Act Statement is on the home page of the Transit Benefits System intranet portal.
4.3	Is an individual’s response to the request for information voluntary or mandatory?	An individual’s response to the request for information is voluntary.

4.4	What are the consequences if an individual declines to provide the information?	If individuals decline to provide the requested information they will not be approved for transportation or parking benefits.
4.5	What are the procedures that allow individuals to gain access to their information?	Individuals can direct requests for access to their information to the Privacy Act Officer in accordance with the designated SORNs and FHFA's Privacy Act Regulation, 12 CFR 1204.
4.6	What are the procedures for correcting inaccurate or erroneous information?	In order to correct inaccurate or erroneous information, employees can submit an updated annual parking/transportation benefits request with corrected information and/or contact the designated OFOM/OHRM administrators for parking and transportation benefits. Individuals can also direct requests to correct or amend their information to the Privacy Act Officer in accordance with the designated SORNs and FHFA's Privacy Act Regulation, 12 CFR 1204.

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>Yes. Upon request, reports are provided to the Office of Planning, Performance, and Risk (OPPR) for the creation of consolidated dashboard reports. Reports may also be shared and used for (1) internal OHRM audits to verify that employees' transit subsidy information is current; and (2) tracking to ensure customer requests are completed and to evaluate Public Mass Transportation Reimbursement (PMTR) performance in administering the transit benefits program.</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>Yes. Reports are provided to Hines building management to verify the personnel authorized to park in the FHFA HQ parking garage. Benefits information is also submitted to WMATA's portal by the OHRM transit benefits administrator in order for WMATA to provide the employee benefits.</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 routine use (10) in SORN FHFA-11, Transit Subsidy Program Records, 76 Fed. Reg. 33293 (June 8, 2011) and routine use (10) in SORN FHFA-12, Parking Program Records, 76 Fed. Reg. 33294 (June 8, 2011).</p>
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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>No. The System Security and Privacy Plan (SSPP) documents the account management procedures applicable to the system.</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>All FHFA employees are required to participate in annual Information System Security Awareness, Privacy, and Records and Information Management trainings. Additionally, FHFA users with elevated privileges and access to the System receive specialized security training, including training on account management procedures by OTIM.</p>
6.4	<p>Describe the technical/administrative safeguards in place to protect the data.</p>	<p>As documented in the SSPP, access to the Transit Benefit System is limited to those with a business need to access the System and who have been approved for access by the system owner. Role-based access controls are designed into the system and users are granted the least privileged role required to carry out their responsibilities. The Transit Benefit System is hosted by FHFA and accessible only to FHFA users with valid Active Directory accounts. Technical and administrative safeguards are documented within the SSPP and tested prior to authorization and annually thereafter as part of</p>

		FHFA’s assessment and authorization (A&A) process and consistent with the NIST Risk Management Framework. These safeguards include, but are not limited to procedures for securely managing access to the system, assigning permissions based on the concept of least privilege, generating and reviewing audit logs, data encryption, etc.
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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	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.	In the event of a data loss or mishandled data, the risk to personal privacy of FHFA personnel is that their benefit application information, such as their name, employment status, duty station, work phone number, email address and WMATA SmarTrip card number has the potential of being compromised. Also, the names of visitors and contractor personnel who request temporary parking may be compromised. These risks are mitigated by the use of FHFA’s OTIM IT Security procedures for securely managing access to the system and for reviewing user activity for indications of inappropriate use.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	Since the data is retained for up to 3 years past the date of employee participation in the transit benefit program, the risks associated with the length of time data is retained is that the data is susceptible to loss and/or compromise. Such risks are mitigated by only allowing limited access, password controls, logging activities, etc. to monitor access to information.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	The primary risk associated with external sharing of the data is the possibility for user information to be lost or otherwise compromised. The risks are mitigated and minimized by not allowing third party access to the system; rather reports are generated from the system and shared with the necessary third party.