



Privacy Impact Assessment (PIA) Template

Acquired Member Assets (AMA) Database

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System/Collection Overview			
<p>The purpose of the Acquired Member Assets (AMA) Database is to provide the Federal Home Loan Banks (FHLBanks) with a system to provide quarterly data on new AMA loans that they have acquired and a status update on the loans that are still active. The AMA Database also enables FHFA employees who have been granted access the ability to query Bank information for analysis. This helps the Agency in its mission to ensure that the FHLBanks are operating in a safe and sound manner.</p> <p>The AMA Database is internally operated.</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 will collect PII to include demographic, employment, income- loan, and property location-related information.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The information is obtained from loan applications or other documentation submitted to member banks by loan applicants. FHLBanks acquire the information from member banks.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	This information is being collected to assist examiners in evaluating a FHLBank's acquired member assets to ensure that FHLBank is operating in a safe and sound manner.

1.4	How is the information provided to or otherwise obtained by the System/Collection?	The information is provided by the FHLBanks through a secure portal on the Agency's Nexttranet site.
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 is used to ensure the FHLBanks' acquired member assets programs are being operated in a safe and sound manner.
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.	FHFA employees who want to use and access the information are required to submit an email requesting access that includes their official business need for the information. They are given a demonstration and are informed that they can only access the information with "read" privileges and are not authorized to modify the information.

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?	Records are destroyed or deleted 30 years after the date the AMA Database is retired.
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.	The applicable record retention schedule is Comprehensive Records Schedule 2.3b, which applies to mission-related information that is gathered and maintained for internal FHFA analysis and business purposes, and that is 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 information is contained.

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. 	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.	The information is submitted to the FHLBanks by its member banks. The member banks collect the PII via loan applications. The FHLBank does not directly collect PII from individual loan applicants. FHFA obtains the PII from the FHLBanks and does not directly obtain any PII from individual loan applicants.
4.3	Is an individual's response to the request for information voluntary or mandatory?	Voluntary
4.4	What are the consequences if an individual declines to provide the information?	None
4.5	What are the procedures that allow individuals to gain access to their information?	An individual submits the form to the member bank when filling out the loan application. Only the member bank can grant or provide access to an individual's information, including PII. Neither FHLBanks nor FHFA can provide access.
4.6	What are the procedures for correcting inaccurate or erroneous information?	Inaccurate or incorrect information could be discovered by FHFA staff during monitoring of the database or by FHLBank staff. If FHFA staff notices an error, the Agency works with the FHLBank to correct and resubmit it. If the FHLBank discovers the error, the bank is required to inform FHFA and re-report the correct data.

Section 5.0 Sharing and Disclosure

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

#	Question	Response
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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>The information is not shared with any other internal FHFA offices or divisions. Database users can query the data through a database tool (such as MS Excel or tableau).</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>No information from the AMA Database is shared with persons, agencies, or other entities external to FHFA; however, information from the AMA Database is used to populate the Public Use Database. The following measures have been taken to remove or anonymize all PII before being added to that database:</p> <ul style="list-style-type: none"> • The “loan acquired date”, which showed a day/month/year, was removed and replaced only with the year; • The “note date” (i.e., the loan origination date), which showed the day/month/year, was removed and replaced on with the year; and • Actual credit scores of individuals were replaced with a range in the following scale of five: less than 620; 620-659; 660-699; 700-759; and greater than 759.
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 a 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	<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>An OIG employee could request and, if granted by FHFA, gain access to the AMA Database. OIG employees must first complete the AMA Database access request form, which includes a description of the approved official business use for the information, and get it signed by that OIG employee’s supervisor. OIG employees with authorized use for the information are limited to “read” privileges and will not be able to query or otherwise manipulate the data.</p> <p>FHLBank employees have “write” privileges to the Database and can submit data via the Nextranet to further populate the AMA Database.</p> <p>FHLBank employees do not, however, have</p>

		<p>“read” privileges to the information and cannot view or query the information therein.</p> <p>The Division of Bank Regulation (DBR) External Reporting Systems Security and Privacy Plan documents procedures for all persons, whether FHFA employees or contractors or external persons, requesting access to the AMA Database.</p>
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.	There are no conflicts of interest.
6.3	Describe the type and frequency of training that is provided to users that is specifically or generally relevant to the System/Collection.	<p>Training for FHLBank employees is provided on an as-needed basis. If a FHLBank has an employee who is new to uploading/importing information into the Database and requests a training demo, FHFA will provide it. Sometimes, however, the FHLBank turns down FHFA’s offer and instead chooses to itself provide the training directly to the new employee.</p> <p>For FHFA users who are just accessing the information on a read-only basis, FHFA provides training to FHFA employees on how to access information located in the Database, limit their view of the information to only what is needed for official business purchases, avoid viewing for which they do not have an official need to know, and not make any changes to information to which they have access.</p> <p>All FHFA employees are required to complete new employee security, privacy, and Records and Information Management (RIM) training to obtain and maintain access to FHFA systems, and annual training thereafter.</p> <p>FHFA employees with elevated privileges receive specialized security training. Role-based privacy awareness training is required for FHFA employees whose work duties and responsibilities involve the collection, use, storage, access, or maintenance of PII.</p>
6.4	Describe the technical/administrative safeguards in place to protect the data.	<p>The Database is a Structured Query Language (SQL) based database that requires FHFA and external users to have an account to access the Agency's Nextranet site. Establishing an account requires the submission of an authorization form containing the official business to know the information that is signed by the employee’s supervisor.</p> <p>Technical and administrative safeguards are documented within the DBR External Reporting Systems Security and Privacy Plan and also</p>

		<p>tested prior to authorization and annually thereafter as part of 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.</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	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.	Names are not collected within the AMA Database. The AMA Database is only linkable/combinable with the Membership database, the latter of which does not contain any PII and only contains information associated with the member bank who issued the loan. Accordingly, there appear to be no risks specifically associated with the amount or type of PII collected in the AMA Database.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	Although the PII is maintained for a long time even after the AMA Database is retired, there does not appear to be any risk specifically associated with length of retention.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	The only external sharing of this data is potentially with the OIG, which must first be requested as described above. Since the existence of the Public Use Database, which includes information from the AMA Database, no external persons have requested access to the non-sanitized version of this database. Accordingly, there does not appear to be any risk specifically associated with external sharing of the PII.

