Privacy Impact Assessment (PIA) Template

Polypaths (Capital Models)

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System/Collection Overview
The Polypaths model stores the terms and conditions – for example, the interest rate a lender will charge a borrower without adjustments for lender credits or discount points, also known as "par amount", for a mortgage loan or pool – and the calculated metrics of financial instruments. Market rates are primarily collected from Bloomberg. These market rates are stored in each Polypaths file.   Polypaths uses two types of models: the AppPort or "primary" model and the Asset Liability Management (ALM) model. The AppPort model focuses on assessment of market risk and is available to all users. The ALM model is an income forecasting model. Due to limited resources, there are more users of the AppPort model than the ALM model, as there is currently less of a need for income forecasting than market risk assessment. For the ALM model, the System Owner (SO) assists users in setting up an account in the model to store individual data and in that process the SO creates a username and password in the model for each user. This information, which is stored in the ALM database, is only intended to restrict "write" access – all users have "read" access to all models – to ALM models so that only the user creating that model can alter it. The SO then informs the user to create a new password from their windows credentials. This information system and the models therein aid FHFA in the market risk analysis and pricing benchmarks of the financial instruments on the balance sheets of the Federal Home Loan Banks, Fannie Mae, and Freddie.   The System Owner (SO) collects and maintains the following information in an Excel file for individual users of the primary model in Polypaths: Name   Business Email   Division/Branch   Purpose of using the model

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?	Names, FHFA email addresses, division/branch, usernames, and passwords for all users.

1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The individual users who are provided access to the system.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The information is maintained to document who has access to the model and for what purpose, as well as to track the training of FHFA users for this information system.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	Users request access to this information system by submitting Form 90 (software request form) through the established eWorkflow and thereby disclose their name, division/branch, and FHFA email.

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?	The information is used to maintain a log of users (as part of compliance with the vendor agreement) and to provide a list to the vendor for training purposes.
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 SO stores the Excel file in a folder where only the SO and other individuals with a need to know have access.

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?	Polypaths records are temporary and will be destroyed or deleted seven years after the completion of the project, activity, or transaction.
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 in this information system are subject to FHFA Comprehensive Record Retention Schedule Item 2.2f. Workpapers. This retention schedule item applies to supporting documentation and other routine records created or collected by FHFA to support supervision and housing mission activities. Records related to safety and soundness

		examinations or other statutorily required evaluations of the regulated entities are not included.

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, the Privacy Act does not apply to this system. This system allows searches of the various models saved by the users. Polypaths does not aggregate information about the user or any other individual that is searchable by that user's/individual's name or other personal identifier. Because a search of records using a name or personal identifier would not retrieve records "about an individual," as required by the Privacy Act, a SORN is not needed.
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.	N/A. No PII is collected directly from the individual FHFA users, unless the Requestor submitting Form 90 for a new user to gain access to this system, its models, and application is also identified on that form as a prospective user of the system. There is an official business need for this PII for purposes of the general operations of FHFA, and therefore the collection, use, and retention of this PII is authorized under 12 U.S.C. 4512, 12 U.S.C. 4526, 44 U.S.C. 3506, and 5 U.S.C. 301.
4.3	Is an individual's response to the request for information voluntary or mandatory?	For access to Polypaths, the user is required to fill out Form 90, which is maintained by OTIM. The only PII requested by Form 90 is the requestor's and/or prospective user's name.
4.4	What are the consequences if an individual declines to provide the information?	If the FHFA employee refuses to provide the requested information, that employee will not be provided access to this system or the models therein.
4.5	What are the procedures that allow individuals to gain access to their information?	The individual user contacts the SO directly to gain access to see the spreadsheet.
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.	The information is shared with OTIM, which manages access to this system, and the Contracting Office Representative (CO) in the Office of the Chief Operating Officer (OCOO) for the purpose of managing the contract associated with this system.
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.	This information is shared with the vendor for the purpose of tracking and providing annual and other training to FHFA users. The information includes the users' names, email addresses, division/branch, and model use.
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 a does not apply, identify the legal authority that permits the sharing outside FHFA.	Yes, the information collected is provided to the vendor to monitor and provide training needed by FHFA users in order to maximize the utility of the models and carry out FHFA's statutory missions, as authorized by 12 U.S.C. 4512, 12 U.S.C. 4526, 44 U.S.C. 3506, and 5 U.S.C. 301. No SORN applies to this information system/record collection, as noted in the response to Question 4.2.

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.	No
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 for use of FHFA systems at onboarding and annually thereafter. In addition, all FHFA users with elevated privileges receive specialized security training, and role-based privacy awareness training is

		required for those individuals whose work duties and responsibilities involve the collection, use, storage, access, or maintenance of PII. In addition, the SO provides as-needed assistance with the model and the vendor hosts an annual training event.
6.4	Describe the technical/administrative safeguards in place to protect the data.	As documented in the System Security and Privacy Plan (SSPP), access to Polypaths is limited to those with a business need 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. Polypaths is hosted by FHFA and accessible only to FHFA users with network accounts. Technical and administrative safeguards are documented within the SSPP and 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.

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.	There is very little risk to the user if their name, email address, division, or model usage is compromised.
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 the PII is retained.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	There is a non-disclosure agreement (NDA) in place with the vendor.