



Privacy Impact Assessment (PIA) Template

STATUS TRACKING AND REPORTING (STAR) SYSTEM
(Name of the Information System or Information Collection)

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Date

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System/Collection Overview			
The Status Tracking and Reporting (STAR) system is an existing internally developed and operated system that is used by the Division of Housing Mission and Goals (DHMG), Office of Conservatorship Operations (OCO) to assist the Director of FHFA in overseeing the prudential operations of government-sponsored enterprises (GSEs) pursuant to 12 CFR § 1200.2 and 12 USC § 4513(a)(2)(B). The purpose of the STAR system is to: 1) List and track all issues submitted by Fannie Mae, Freddie Mac and U.S. FinTech (collectively referred to as the “GSEs” for purpose of this document) that require FHFA’s review or action as Conservator; 2) Assist FHFA with generating reports for Conservatorship Committee (CC) meetings, FHFA’s Office of Inspector General (OIG) and Congress as required; 3) Collect information to evaluate prospective senior-level employees and board candidates for the GSEs and their affiliates; and 4) Serve as a records management system for all decisions and directives issued by FHFA.			

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 personally identifiable information (PII), such as name, address, social security number, date of birth, and financial information.

#	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?	STAR collects the name and contact information (e.g., business email address and telephone number) for employees from the GSEs. STAR also collects the following information for prospective senior-level employees, executives, and board candidates for the GSEs: • name; • contact information (e.g., business and home addresses, business and personal

		email addresses, business and personal telephone numbers); • educational credentials; and • work history. The data collected may also include information about independent contractor engagements, professional compensation history, investment holdings, and criminal background checks conducted on current and prospective senior-level employees, executives, and board candidates. These background checks may also include information about their family members.
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 provided to FHFA via STAR are the GSE employees, prospective senior-level employees, executives, and board candidates.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The purpose of this information collection is to: 1) List and track all issues submitted by the GSEs that require FHFA's review or action as Conservator; 2) Assist FHFA with generating reports for CC meetings, FHFA's OIG and Congress as required; 3) Collect information to evaluate prospective senior-level employees and board candidates for the GSEs and their affiliates, as part of FHFA's statutory authority to oversee the prudential operations of each GSE; and 4) Serve as a records management system for all decisions and directives issued by FHFA.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The information in STAR is provided to FHFA from the GSEs via FHFA's 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?	Pursuant to FHFA's authority at 12 CFR § 1200.2 and 12 USC § 4513(a)(2)(B) to oversee the prudential operations of each GSE, STAR is used to: 1) List and track all issues submitted by the GSEs that require FHFA's review or action as Conservator; 2) Assist FHFA with generating reports for CC meetings, FHFA's OIG and Congress as required; 3) Collect information to evaluate prospective senior-level employees and board candidates for the GSEs and their affiliates; and 4) Serve as a records management system for all decisions and directives issued by FHFA.
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.	To ensure that information is only used in the manner for which it is collected, access to STAR and the information therein is limited to those individuals who have a need-to-know in the performance of their official duties.

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?	The information in STAR is retained for 30 years after cutoff then transferred to NARA permanently.
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, a retention schedule has been approved. The records are retained pursuant to Item 3.2 of FHFA's Comprehensive Record Schedule. The NARA Authority for this Records Schedule is N1-543-11-1, as approved on 01/11/2013.

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.	Yes. The system is covered by FHFA-28, Government-Sponsored Enterprise Prospective Employee Directory, 87 FR 50859, published August 18, 2022.
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.	STAR is not the original point of collection. The information that is collected is provided to FHFA from the GSEs. However, SORN FHFA-28 and this PIA covers the collection and provides public notice.
4.3	Is an individual's response to the request for information voluntary or mandatory?	Information is not provided directly to FHFA by the individual therefore this is not applicable.
4.4	What are the consequences if an individual declines to provide the information?	Information is not provided directly to FHFA by the individual therefore this is not applicable.
4.5	What are the procedures that allow individuals to gain access to their information?	Individuals may submit a Privacy Act request for access to their information to FHFA's Privacy Act Officer pursuant to 12 CFR § 1204.3(b). Additional information regarding Privacy Act requests is available at https://www.fhfa.gov/about/privacy.
4.6	What are the procedures for correcting inaccurate or erroneous information?	Individuals may submit a request to amend or correct records to FHFA's Privacy Act Officer pursuant to 12 CFR § 1204.3(d). Additional information regarding the amendment of records pursuant to the Privacy Act is available at https://www.fhfa.gov/about/privacy.

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 in STAR is shared internally, on a need-to-know basis, with the Office of General Counsel, Division of Bank Regulation, Division of Enterprise Regulation, Office of Markets and Enterprise Monitoring’s OCO, and Office of the Director. The information shared consists of: 1) Documents provided to FHFA from the GSEs that require FHFA’s review or action as Conservator; 2) Documents provided to FHFA from the GSEs to generate reports for CC meetings, FHFA’s OIG and Congress as required; and 3) Documents provided to FHFA from the GSEs in order to evaluate prospective senior-level employees and board candidates for the GSEs and their affiliates. The purpose of sharing this information is to assist the Director in overseeing the prudential operations of the GSEs pursuant to 12 CFR § 1200.2 and 12 USC § 4513(a)(2)(B).
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.	Information in STAR may be aggregated and shared externally with FHFA’s OIG for the purpose of performing audit or oversight operations as authorized by law, but only such information as is necessary and relevant to the audit or oversight function. No PII is shared with FHFA OIG. However, PII may be shared with Congress, only as necessary for reporting on FHFA’s activities.
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.	Yes, the sharing of PII outside the agency is compatible with the original information collection and the routine uses noted in SORN, FHFA-28.

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.	Yes, non-FHFA personnel from the GSEs have access to STAR via FHFA's Nexttranet; however, GSE employees can only access information in STAR that has been submitted by their GSE employer. GSE and FHFA contractors may also have access if they are authorized by a GSE or FHFA supervisor. System Owners control who may access STAR and what information is accessible therein. Access is limited to those who have a need-to-know in the performance of their official duties. This access is in alignment with FHFA's <i>Use and Protection of PII</i> policy.
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 training as part of 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 regularly involve the collection, use, storage, access, or maintenance of PII. GSE personnel are not required to take these trainings since their access to STAR is read-only and restricted to information submitted by their GSE employer.
6.4	Describe the technical/administrative safeguards in place to protect the data.	STAR is hosted by FHFA and as documented in the System Security and Privacy Plan (SSPP), access to the system and the information therein is restricted to FHFA employees and contractors with valid Active Directory accounts and a business need to access STAR in the performance of their official duties. Access is also limited to GSE employees who upload information into STAR and have been approved for access by the System Owners. Role-based access controls are designed into the system and users are granted the least privileged role required to carry out their responsibilities.

		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 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, and data encryption.
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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.	STAR collects the name, contact information, compensation and employment history, and the results of criminal background checks for private individuals. A breach related to this information could result in embarrassment and loss of privacy in addition to increased risk of identity theft, targeted phishing attacks, or other fraudulent activity. To mitigate this risk, access to STAR and the information therein is limited to those who have a need-to-know in the performance of their official duties. Further, information is protected as described in Section 6.4.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	There is a higher risk level given the relatively long retention period (30 years) for records in the system. These risks are mitigated by continuously limiting access to STAR and the information therein to those who have a need-to-know in the performance of their official duties. Additionally, STAR users that do not login/access the system for 180 days are automatically removed from the system.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	There are minimal risks associated with the external sharing of PII in STAR. Information in STAR that is shared externally is aggregated to the maximum extent possible, to limit any specific individual being identifiable.