



Privacy Impact Assessment (PIA) Template

Fair Lending Oversight Data System

(Name of the Information System or Information Collection)

May 2025

Date

System/Collection Overview

The purpose of the Fair Lending Oversight Data System is to store, maintain, and analyze information for fair lending oversight of FHFA's regulated entities. The data system is used for compliance activities, policy analysis, and for storage of fair lending information shared with other agencies in certain circumstances.

The database system is a collection of independent sources of data from the regulated entities and data collected by other federal agencies that contain information on a borrower, a property, or a loan application. FHFA uses supervisory, regulatory, conservator, and other authorities to obtain the data on an ongoing basis as well as make as-needed data requests.

The data is used to analyze compliance with the Fair Housing Act, the Equal Credit Opportunity Act, and the Safety and Soundness Act. It is also used for policy analysis and conservator oversight of the Enterprises. Information is shared with other Federal agencies in certain circumstances.

The current database system is located on the Data Analytics Platform (DAP) and follows FHFA IT security protocols, with limited access. The database system contains the following types of information:

- Information about borrower and loan characteristics such as credit score, closing costs, interest rates, income, race, ethnicity, sex, age, debt ratio, and loan amount;
- Information about loan transactions including mortgage loan originator identification numbers, originating lender identifiers, and seller identifiers;
- Information about loan payment history;
- Information about property characteristics obtained from appraisal and collateral reports such as appraised value, comparable properties, and adjustments that are involved in loan applications and transactions;
- Information about appraisers performing appraisal reports such as name and license number;
- Information about multifamily property transactions including information about parties involved in the transaction including names, property addresses, and transaction underwriting characteristics;
- Information about real-estate owned properties such as appraised values, condition, repair status, and property address;
- Information about automated underwriting system loan applications including property address and borrower and loan characteristics and automated underwriting system results;
- Data collected from Fannie Mae and Freddie Mac pursuant to FHFA's regulatory authorities;
- Home Mortgage Disclosure Act (HMDA) regulator data provided by the Consumer Financial Protection Bureau (CFPB) to FHFA for fair lending purposes;
- Individual complaints related to fair lending oversight issues received from the Department of Housing and Urban Development (HUD), other FHFA offices, FHFA Office of Inspector General (OIG), or other sources; and
- Other information about applicants, properties, borrowers, and loan transactions obtained as part of FHFA oversight.

In some cases, these data elements are sourced from other agency data collections with appropriate controls.

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, 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 data system contains information on race, ethnicity, age, sex, loan originator identification number, appraiser registry identification number, home/business address and telephone number, mortgage loan number, geolocation data, credit score, income, debt ratio, and loan amount, among other data elements.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The data stored is sourced from other offices/components within FHFA, the regulated entities, HUD, and the CFPB.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The information is being collected and analyzed for fair lending compliance, investigation, enforcement, policy analysis, and supervisory reviews conducted by FHFA. The information is shared with other federal fair lending and fair housing regulators in certain circumstances for fair lending and fair housing investigation, supervision, and enforcement purposes.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The mode of data transfer is via Secure File Transfer Protocol (SFTP). FHFA's Office of the Chief Information Officer (OCIO) receives the data from the server and stores it in the appropriate directory with UNIX or Active Directory access controls.
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; and3) 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?	Authorized FHFA users use the database system for supervision of the regulated entities. The datasets are used for conducting compliance reviews, analyzing the impact of proposed or existing policy, monitoring, reporting, and general research. The data is also used to identify mortgage interest rate disparities of primary market lenders. The information is shared with other federal fair lending and fair housing regulators in certain circumstances for fair lending and fair housing research, investigation, supervision, and enforcement 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.	FHFA's OCIO grants access to fair lending data directories on the DAP for those who have a need to know. OCIO requires approval by the owner of the data directory to grant access. This structure limits access to the those who have a need for the information to perform their official duties. UNIX and Active Directory control access within directories, based on the owner and group-level access. FHFA also requests PII data elements to be contained in separate datasets within subdirectories. Data obtained from existing datasets within FHFA is used in accordance with FHFA policies and procedures.

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?	Information is retained pursuant to the FHFA's Comprehensive Records Schedule (CRS) Items 2.3a and 2.3b, which require the maintenance of certain records permanently and certain records for 30-year retention.
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, FHFA's CRS Items 2.3a and 2.3b provides the approved record retention schedules applicable to this system's records.

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? <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, this system is covered by FHFA-27, Fair Lending Oversight Data System.
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.	FHFA does not provide notice regarding the collection of PII because FHFA does not collect the information directly from individuals. The information is provided to FHFA by third parties (e.g., the regulated entities, other agencies).
4.3	Is an individual's response to the request for information voluntary or mandatory?	Not applicable. FHFA does not collect information directly from individuals.
4.4	What are the consequences if an individual declines to provide the information?	Not applicable. FHFA does not collect information directly from individuals.
4.5	What are the procedures that allow individuals to gain access to their information?	Individuals may submit a Privacy Act request to FHFA's Privacy Act Officer pursuant to 12 CFR §1204.3(b).
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).

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)? <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.	Data is used and shared across FHFA divisions as necessary for compliance, supervision, policy, and research purposes.

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>PII is shared with other federal fair lending and fair housing regulators and other federal agencies, e.g., HUD, in certain circumstances for fair lending and fair housing research, investigation, supervision, and enforcement purposes. For example, mortgage interest rate disparity data is shared with federal fair lending regulators annually under 12 U.S.C. 4561(d).</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 a does not apply, identify the legal authority that permits the sharing outside FHFA. 	<p>Yes, FHFA-27, Fair Lending Oversight Data System provides that information in the system may be shared with federal agencies for fair lending and fair housing research, investigation, supervision, and enforcement. Information may also be shared pursuant to any other routine use listed in FHFA-27.</p>

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>FHFA OIG does not have routine access to this system or the data therein, but FHFA contractors may gain access to the data system to discharge their contractual duties. OCIO provides contractor personnel with access to the system as described in section 2.2.</p> <p>Permissions are governed based on UNIX and Active Directory group access on the DAP. Access requires approval by the owner of the data directory. UNIX and Active Directory groups are utilized to control access to each dataset residing on the DAP.</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>Not applicable.</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 undergo Security, Privacy, and Records and Information Management training as part of new employee onboarding training and annually thereafter. In addition, individuals whose work duties and responsibilities involve the regular collection, use, storage, access, or maintenance of PII receive role-based privacy training.</p>

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 the Fair Lending Oversight Data System is limited to those with a business need and who have been approved for access by the system owner. Role-based access controls are integrated into the system and users are granted the least privileged role necessary for their responsibilities. The Fair Lending Oversight Data System is hosted by FHFA and accessible only to FHFA users with valid Active Directory groups/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.
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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.	<p>The information in the system includes information such as credit score, income, debt ratio, and loan amount, that if improperly disclosed has the potential to embarrass or harm an individual. The geographical location information is stored separately in the form of latitude, longitude, street address, and Census tract.</p> <p>The information could be merged by location with publicly available data to obtain proprietary loan and credit information for a particular address. Risk is mitigated by limiting access within the agency to only those individuals who have a need for access to perform their official duties and by requiring the database owner to verify the need for access.</p>
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	Long retention periods pose a risk that information can be accessed long after collection. This risk is mitigated by limiting user access to individual datasets to that which is necessary and providing user training on data use and record retention.

7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	With sharing of appraisal and mortgage or other data, privacy risks to the individual include the identification of specific property attributes such as address. However, privacy risks are mitigated with separation of PII and underlying data when shared with partner regulatory agencies.
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