



## **Privacy Impact Assessment (PIA) Template**

**GROUNDDED SOLUTIONS NETWORK HOMEKEEPER DATA**  
**(Name of the Information System or Information Collection)**

**March 2024**  
**Date**

### System/Collection Overview

FHFA's Duty to Serve (DTS) team seeks to enter a data sharing agreement with Grounded Solutions Network (GSN) to receive data on shared equity transactions. FHFA will not provide data to GSN under this agreement. The data from GSN will be used by FHFA to evaluate the Enterprises' shared equity loan purchases in a market context. Shared equity loans provide affordable homeownership opportunities for single-family borrowers. The shared equity market faces financing challenges due to nonconventional titling of properties and is an underserved market that the Enterprises have a duty to serve by providing sources of liquidity for shared equity loans in the secondary market.

This is a new collection that will be operated by FHFA and stored on the Modeling and Research System (MARS) Data Analytics Platform (DAP), which is a primarily cloud-based system that is comprised of multiple environments, databases and tools used by researchers and analysts for analyzing and processing historical and current housing data and for forecasting future trends and patterns.

### 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 information in the collection includes but is not limited to property information, transaction information, and applicant and seller information. Data about the shared equity program and participating organizations are also included in the collection.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	Grounded Solutions Network (GSN) is the source of the information. GSN maintains and operates a database called Homekeeper, in which participating organizations can use to track sales and resales of shared equity homes. The homekeeper database is the source of the information provided in the data sharing agreement.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	Shared equity is a niche underserved market that the Enterprises service under the DTS program. GSN collects information from shared equity programs that can help FHFA assess and evaluate the Enterprises' activities in this market.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	GSN will provide raw data in four separate password-protected CSV files in a shared folder to which FHFA will be given access.

1.5	<p>Are Social Security Numbers (SSNs) being collected or used in the System/Collection?</p> <ul style="list-style-type: none"> <li>If yes, describe in detail: <ol style="list-style-type: none"> <li>The business justification for collecting or using SSNs;</li> <li>The consequences if SSNs are not collected or used; and</li> <li>How the SSNs will be protected while in use, in transit and in storage.</li> </ol> </li> <li>If no, state “N/A” in the response section.</li> </ul>	N/A
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## 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 purpose and use of the information is to assist in the annual evaluation of the Enterprises' shared equity loan purchases.
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 will sign and adhere to a data sharing agreement with GSN. Additionally, access to the data is limited to five FHFA employees and two contractors who have a need to use the information for their specific program purposes. These specific individuals are authorized by the System Owner and their names will be listed in the data sharing agreement with GSN.

## 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?	As provided in the data sharing agreement, FHFA will retain this information for the life of the project and will seek to renew the agreement as needed for the project. The records will be destroyed 30 years after the close of the project.
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 Comprehensive Records Schedule category 2.2c.

#### 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"><li>• If no, please put "no" in the Response section.</li><li>• 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.</li></ul>	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.	Notice is not provided because the information is not obtained from individuals. FHFA is not the original point of collection.
4.3	Is an individual's response to the request for information voluntary or mandatory?	N/A
4.4	What are the consequences if an individual declines to provide the information?	N/A
4.5	What are the procedures that allow individuals to gain access to their information?	N/A
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)? <ul style="list-style-type: none"><li>• If yes, please identify the FHFA office(s) or division(s) and describe the information shared and for what purpose.</li><li>• If no, please state "N/A" in the response section.</li></ul>	No. The data will be used by the Office of Housing and Community Investment (OHCI) DTS team and its contractors to analyze and assist in the evaluation of the Enterprises' performance in the shared equity market.

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"> <li>• If yes, please identify the information shared, and for what purpose.</li> <li>• If no, skip to Section 6.</li> </ul>	No.
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"> <li>• If yes and a SORN applies, identify the applicable routine uses in the SORN listed in Question 4.1.</li> <li>• If no and/or a SORN does not apply, identify the legal authority that permits the sharing outside FHFA.</li> </ul>	PII is not externally shared outside the agency.

## 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"> <li>• If yes, how will they gain access to the System/Collection?</li> <li>• If no, how will the agency control access to and use of that information?</li> <li>• Are there procedures or criteria documented in writing? If so, please describe.</li> </ul>	Yes, FHFA's contractors with a need-to-know will have access to the data. The Analytics Platform System Security Plan describes how the DAP meets all NIST security controls, including AC-6 Principle of Least Privilege, which allows only authorized access for users which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions.
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 at 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 involve the collection, use, storage, access, or maintenance of PII.

6.4	Describe the technical/administrative safeguards in place to protect the data.	The data will be stored on the MARS DAP and protected by the safeguards described in the FHFA System Security Plan for the Analytics Platform. Linux and Active Directory groups will be utilized to control access to the dataset residing on MARS DAP. Oracle security groups are used to control access to the Data Warehouse. Data owners approve all access to datasets under their control.
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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.	The risks to an individual's privacy are low if the information is lost or compromised. Pursuant to the Fair Information Practice Principles (FIPPs) minimization requirements, FHFA opted not to collect sensitive PII (i.e., names of buyers and sellers, or street addresses in the data collection). While the loss of transaction data could identify the geographic data of a buyer or seller, that loss would be limited to a city, county, and/or state only. The risks were mitigated by requiring GSN to withhold sensitive PII from the data shared with FHFA.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	There are risks associated with the length of time data is retained pursuant to the data sharing agreement with GSN and also the record retention schedule. The retention time increases the potential exposure of the PII through improper access by unauthorized individuals or improper use by those authorized to access the data. These risks are mitigated by the access controls described in section 6.4, which reduces the risks of improper access and use.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	There is no risk associated with external sharing because the PII will not be shared externally. Insights derived from aggregated data may be shared, but FHFA will ensure that data is aggregated by a method that prevents reidentification, thereby protecting the privacy of individuals.