



Privacy Impact Assessment (PIA)

MENTORSHIP MATCHING SYSTEM

(Name of the Information System or Information Collection)

July 2026

Date

System/Collection Overview

The Mentorship Matching System (MMS) is an existing, FHFA-operated system designed to manage and document requests and assignments of mentorship relationships between FHFA employees. The purpose of the system is to facilitate mentor/mentee interactions that promote professional growth, career development, knowledge sharing, and leadership advancement. The system allows mentors and mentees to upload information about themselves to either request a mentor or volunteer to serve as a mentor.

Section 1.0 Characterization of the Information

The following questions address the scope of the personally identifiable information (PII) requested and/or collected. PII is information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. PII includes, but is not limited to, name, address, Social Security number, date of birth, financial information, and demographic information.

#	Question and Response
1.1	<i>What and whose PII is being collected, used, disseminated, or maintained?</i> FHFA mentor and mentee name, photograph, business telephone and mobile number, business email address, supervisor's name, username, IP address, job title, work location, program/office, work experience, professional certifications, education history, work history, resume and/or other information typically found in a resume will be collected, used, and maintained in the system. The system is open only to FHFA employees.
1.2	<i>If Social Security Numbers (SSNs) are included, describe in detail:</i> <i>1) The business justification for collecting or using SSNs;</i> <i>2) The consequences if SSNs are not collected or used;</i> <i>3) How the SSNs will be protected while in use, in transit and in storage.</i>

	SSNs are not requested or collected.
1.3	<i>How is the PII obtained? If individuals are not providing their own PII directly, describe where the information originates and any intermediaries it goes through before being provided to FHFA. Include a description of the mechanism by which the PII is provided to/obtained by FHFA.</i> Individual mentor and mentee business contact information is retrieved directly from FHFA's Microsoft Active Directory system, a centralized directory service. All other information, e.g., resume details, self-identified areas of expertise and areas of interest, are provided directly by the employee.
1.4	<i>How will the PII be used and for what purpose?</i> The purpose of the system is to document and track all mentorship requests, assignments, and logs. The PII will be used to determine matches for mentorship relationships and for communication between mentors and mentees.
1.5	<i>Is there a risk that PII other than that described above will be collected? If no, explain why not. If yes, explain the risk and how the risk is mitigated.</i> There is a slight risk that users may enter more PII than what is necessary because the system includes open text fields allowing users to provide additional information. To mitigate this risk, the system owner instructs all users to include only the information that will support their request to be a mentor or mentee. Additionally, only the individual user can enter information about themselves, beyond what is retrieved from Active Directory, ensuring that shared data is voluntary and limited to what the user chooses to disclose.
1.6	<i>Is there a risk that the PII collected will be inaccurate? If no, explain why not. If yes, explain the risk and how the risk is mitigated.</i>

	The risk that the PII collected will be inaccurate is minimal. PII is obtained directly from the employee and Active Directory, which are reliable sources of accurate PII.
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Section 2.0 General

The following questions address general information about the information in the system, including how the information will be used and for what purpose.

#	Question and Response
2.1	<i>What is the legal authority for the collection?</i>
	5 U.S.C. Chapter 41, 12 U.S.C. § 4513(a)(2)(B); 5 CFR Part 410; 5 CFR § 412.202.
2.2	<i>Is the collection of information subject to the Paperwork Reduction Act? If yes, what is the OMB Control Number for the collection?</i>
	No. The information in this system is not collected in a manner that is subject to the Paperwork Reduction Act.
2.3	<i>Is this a new PIA or an update to an existing PIA?</i>
	This is a new PIA.
2.4	<i>Is the system internally operated or operated by a third-party (e.g., contractor)? If not internally operated, please identify the third party.</i>
	The system is internally developed and operated by FHFA.

	<i>How is the risk of improper use of the PII by FHFA employees/contractors mitigated? If PII is shared with third parties, how will the risk of improper use by those parties be mitigated?</i>
2.5	Risk of improper use is mitigated by limiting access to PII to those who have a need to know. Only the system owner and Office of Human Resource Management (OHRM) employees involved in managing the Mentorship Matching program have access to all the information in the system. Mentees are permitted to view the mentors who have voluntarily provided their information with the understanding that it will be viewed by potential mentees. Mentors are able to view the information of mentees that have been assigned to them. The risk of improper use is also mitigated by the fact that FHFA employees receive annual privacy and information technology security training regarding the proper use of PII and are reminded at least annually regarding adverse consequences that may result from improper use of PII.

Section 3.0 Retention

The following questions address how long PII will be retained after the initial collection.

#	Question and Response
3.1	<i>How long is the PII retained?</i> Mentorship program data will be maintained for five years after the program ends to support reporting and evaluation.
3.2	<i>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.</i> Yes. The relevant records schedules are GRS 2.6.030 – Individual Employee Training Records and GRS 2.6.010 – Non-mission Employee Training Program Records. Both schedules specify a retention period of 3 years after supersession, with the option for longer retention if business needs require it. In this case, OHRM has determined these records should be retained for five years to support reporting and evaluation, as noted above, which is permissible and aligns with the guidelines for the applicable GRS items.

Section 4.0 Notice, Individual Access, and Correction

The following questions address notice to the individual, the individual's right to consent to uses of the PII, the individual's right to decline to provide PII, and the individual's ability to ensure the accuracy of the PII collected about them.

#	Question and Response
4.1	<i>Is information about an individual retrieved by an individual's name or personal identifier such as name, email address, or date of birth? If yes, identify the applicable System of Record Notice (SORN).</i>
	Yes. FHFA-32, Mentorship Matching System. Available here: https://www.fhfa.gov/about/privacy/systems-of-records-notices .
4.2	<i>How is notice about the collection of PII provided to an individual prior to collection from that individual? If notice is not provided, explain why.</i>
	A Privacy Act Statement describing FHFA's purpose for collecting the information will be established for the home page of the system. The above-referenced SORN also provides notice.
4.3	<i>Is an individual's response to the request for PII voluntary or mandatory?</i>
	The response to the request for information is voluntary.
4.4	<i>What are the consequences if an individual declines to provide the requested PII?</i>
	An individual may not be considered for a mentor/mentee assignment if the requested information is not provided.

4.5	<i>What are the procedures that allow individuals to gain access to their PII?</i>
	An individual can access their information directly through the system. They can also gain access by following the procedures set out in FHFA's Privacy Act Regulations at 12 CFR 1204. More information is available at FHFA's Privacy webpage: https://www.fhfa.gov/about/privacy .
4.6	<i>What are the procedures for individuals to correct or update information about them?</i>
	An individual can correct or update the information that they provide directly in the system. They can also follow the procedures set out in FHFA's Privacy Act Regulations at 12 CFR 1204. More information is available at FHFA's Privacy webpage: https://www.fhfa.gov/about/privacy .

Section 5.0 Sharing and Disclosure

The following questions address the content, scope, and authority for sharing PII.

#	Question and Response
5.1	<i>Is PII shared with other offices or divisions within FHFA? If yes, identify the other offices/divisions and describe the purpose of or business need for sharing the PII.</i>
	Yes, certain PII is shared within FHFA on a need-to-know basis and is strictly for the purpose of supporting the mentorship program. Specifically, PII is shared with OHRM staff, division/office administrative staff and deputy directors who have employees participating in the program, and the mentorship program coordinators.
5.2	<i>Is PII shared with individuals or entities outside of FHFA? External entities include other Federal agencies, state or local governments, regulated entities, FHFA-OIG, and Congress. External entities do not include FHFA contractors that receive PII as needed in their performance of work for FHFA. If yes, please identify the PII shared, and for what purpose or business need.</i>

	Information may be shared with FHFA-OIG for OIG-related work functions (e.g., audits).
	<i>If PII is shared with external entities, describe how the information sharing is compatible with the purpose for which the PII was collected.</i> • <i>If a SORN applies, identify the applicable routine uses in the SORN listed in Section 4.1.</i> • <i>If a SORN does not apply, describe 1) whether notice of the PII sharing was provided and if so, how; and 2) how the sharing of PII is consistent with the purpose for which the information was collected. Sharing with Congress, FHFA-OIG or the Government Accountability Office pursuant to the statutory authorities of those entities need not be addressed.</i>
5.3	Information may be shared with FHFA-OIG for OIG-related work functions. Although FHFA does not anticipate regularly sharing PII from the system with third parties, all other external sharing is addressed in the SORN's Routine Uses section.
	<i>Describe how the risk of intentional or inadvertent disclosure of PII by FHFA employees/contractors is mitigated. (Address both disclosures within FHFA and disclosures to external parties.)</i>
5.4	The risk of improper disclosure of PII is mitigated by granting access only to individuals who are responsible for processing the requests and/or making decisions related to the requests and assignments. The risk is further mitigated by requiring mandatory privacy training for all agency employees and contractors, which includes breach response protocols and role-based privacy training for OHRM employees.
5.5	<i>If PII will be shared with external parties, describe how the risk of improper disclosure of the information by individuals or entities outside of FHFA is mitigated.</i>

	To mitigate the risk of improper disclosure by external parties, whenever feasible, FHFA releases only aggregated, de-identified data to ensure that only the minimum necessary information is released. Further, FHFA will notify any external recipient that the information constitutes PII and of any restrictions on further dissemination.
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Section 6.0 Technical Access and Security

The following questions address technical safeguards and security measures.

#	Question and Response
6.1	<i>Will individuals other than FHFA employees and FHFA contractor personnel performing official FHFA duties have access to the system containing the PII? If yes, how will access to the system be granted and controlled with respect to these external parties?</i> No. External parties will not be given access to the system. Only those involved in processing/decision making are granted access to the system by the system owner. Individual access permissions are reviewed and certified annually. Written procedures on access controls are documented in the General Support System (GSS) System Security and Privacy Plan (SSPP).
6.2	<i>Is any system-specific training or guidance related to PII or privacy provided to users of the system? If so, please describe.</i> Yes. System specific guidance is provided to mentorship participants, outlining how PII is managed within the system and best practices for secure communications and program participation.
6.3	<i>Describe the technical/administrative safeguards in place to protect the PII.</i> The system is stored on the FHFA GSS and protected by the safeguards described in the FHFA GSS SSPP and the GSS PIA. These safeguards include, but are not limited to, role-based access controls that restrict access to information based on Active Directory groups and permissions, auditing of file access and modification, and data encryption. The FHFA GSS is in the ongoing authorization phase of the Risk Management Framework and undergoes annual control assessments and reauthorization consistent with the Risk Management Framework.