



Privacy Impact Assessment (PIA)

OGC MATTER TRACKING AND REPORTING SYSTEM

(SYSTEM NAME)

November 2025

Date

System/Collection Overview

The Office of General Counsel Matter Tracking and Reporting System (Tracking System) is an existing, internally developed and operated FHFA system that tracks assignments, projects, and deliverables for FHFA's Office of General Counsel (OGC).

The Tracking System enables OGC staff members to track the current status and generate reports about any current, past, and planned activities for each matter. The system will also allow OGC staff to view the OGC personnel assigned to the matter, any currently active, completed, or planned tasks, and timelines and due dates applicable to each matter.

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?	<p>The Tracking System collects information to track matters (e.g., assignments, projects, and deliverables) for OGC including the names and division/office of FHFA employees and contractor personnel.</p> <p>The system may also include PII entered by Tracking System users, including the names of individuals who are relevant to an OGC matter (e.g., regulated entity employees, outside counsel, parties in litigation, employees of other federal agencies, or other individuals who interact with FHFA) and the names of the entities those individuals work for or are associated with.</p>
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	<p>The names and FHFA offices for FHFA employees and contractor personnel collected by the Tracking System are obtained directly from the FHFA Active Directory.</p> <p>Other information, including descriptions of matters and the names of individuals interacted with (internal or external to FHFA), is entered by the OGC employee or contractor personnel assigned to each respective matter.</p>

1.3	For what purpose is the information being collected, used, disseminated, or maintained?	<p>The purpose of the Tracking System is to create a database of the matters OGC is working or has worked on to track the current status and generate reports about any current, past, or planned activities for each matter. The Tracking System allows OGC employees to view the OGC personnel assigned to each matter, any currently active, completed, or planned tasks for each matter, and any timelines and due dates applicable to each matter for the above-stated purpose.</p> <p>The system is also used to generate reports to support FHFA's employee performance review process by documenting matters worked on by employees.</p>
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The Tracking System directly interfaces with FHFA Active Directory, which automatically pushes data to the Tracking System. As described in Section 1.1, additional PII provided in the task or status descriptions is manually added by Tracking System users.
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; 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?	See Section 1.3.
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.	Access to the system is limited as described in Section 6.

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 the Tracking System will be retained for 15 years after the cut-off, which is the date the project or activity is completed or superseded.
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, the records will be retained pursuant to Item 6.1a of FHFA's Comprehensive Record Schedule. The NARA authority for this records schedule is N1-543-11-1, as approved on January 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? <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, FHFA-29, OGC Matter Tracking and Reporting System covers this 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.	Notice is provided via SORN FHFA-29. As noted above in response to Questions 1.2 and 1.4, the Tracking System collects certain PII directly from Active Directory and other potential PII directly from system users, which consist of OGC employees and contractors. However, any PII collected from system users is not their own PII and therefore no Privacy Act Statement or other notice is required.
4.3	Is an individual's response to the request for information voluntary or mandatory?	Not applicable. As noted above in response to Questions 1.2 and 1.4, the Tracking System collects certain PII directly from Active Directory and other potential PII directly from system users. However, any PII collected from system users is not their own PII and therefore no Privacy Act Statement or other notice is required.
4.4	What are the consequences if an individual declines to provide the information?	Not applicable. As noted above in response to Questions 1.2 and 1.4, the Tracking System collects certain PII directly from Active Directory and other potential PII directly from system users. However, any PII collected from system users is not their own PII and therefore no Privacy Act Statement or other notice is required.

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). See https://www.fhfa.gov/about/privacy for more information.
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). See https://www.fhfa.gov/about/privacy for more information.

Section 5.0 Sharing and Disclosure

The following questions define the content, scope, and authority for information sharing.

#	Question	Response
5.1	<p>Is information shared with internal office(s) or division (s)?</p> <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. 	<p>Only OGC staff and contractors will have access to the Tracking System. OGC staff could share summary information generated by the system (e.g. reports reflecting project status) with other FHFA offices as needed to conduct agency business. While the intent is not to unnecessarily share PII with other FHFA offices outside of OGC, the status description provided by a system user could contain PII, which could be seen by other FHFA employees or contractors with a need-to-know that OGC tracked matter.</p>
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>Outside of the routine uses identified in FHFA-29, OGC Matter Tracking and Reporting System, including but not limited to routine uses (5) and (9), information in this system is not shared externally.</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, any sharing of PII outside of FHFA is compatible with the original information collection and is covered by any one or more of the routine uses, including but not limited to (5) and (9), identified in FHFA-29.</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 contractors in OGC who have an official need-to-know pursuant to their assigned duties will have access to system PII in accordance with FHFA's <i>Use and Protection of PII</i> policy and routine use (5) in FHFA-29. Where required for audit purposes, OIG personnel may be granted access, as provided in routine use (9) in FHFA-29.</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>No</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, 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 regular collection, use, storage, access, or maintenance of PII.</p>
6.4	<p>Describe the technical/administrative safeguards in place to protect the data.</p>	<p>As documented in the System Security and Privacy Plan (SSPP), access to the Tracking System is limited to those with a business need to access the system 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.</p> <p>The system is hosted by FHFA and accessible only to FHFA users with valid Active Directory 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.</p>

Section 7.0 Risk

The following questions describe the risk to the information within the System or Collection.

#	Question	Response
7.1	<p>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>	<p>Overall, the risks to an individual's privacy are low given the type of PII collected in the system (e.g., name, employer's name, name of division or office in which an FHFA employee works). The PII collected directly by the system is limited to name and business contact information, which, because it is collected from Active Directory, is likely to be accurate and complete and is relevant and necessary for the purpose of the information (e.g., tracking assignments). There is a risk that unnecessary, inaccurate, or incomplete information is collected, in that users of the system can enter additional PII in the descriptions of tasks, but that PII is limited to that which is relevant to the task being tracked and likely to be limited to names and other information that is publicly available (employer name). Accordingly, the risks associated with collection are low.</p>
7.2	<p>Discuss the risks associated with the length of time data is retained and how those risks are mitigated.</p>	<p>Overall, the risk associated with the retention period is low given the type of information and medium-term length of retention identified in Section 3. Risks include improper access and disclosure which is mitigated by limiting access and other security controls, as described in Section 6.</p>
7.3	<p>Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.</p>	<p>The normal operation of this system does not involve sharing of PII outside of FHFA. Notwithstanding, PII may be shared externally under certain circumstances to certain outside agencies, organizations, or individuals as required by law or policy, and those instances and potential recipients are expressly identified in the routine uses provided in FHFA-29. The risk associated with external sharing is low.</p>