



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

**ONESTREAM**

**(Name of the Information System or Information Collection)**

**September 2023**

**Date**

### System/Collection Overview

OneStream is a commercial off-the-shelf (COTS) financial management software program that FHFA uses to manage the annual budget formulation process and the fiscal year budget execution reporting. The system is used to develop the Agency's annual budget (Budget) and cost allocations that support the semi-annual regulated entity Assessment Table and their individual entity letters. The Agency has a statutory and regulatory requirement to send the regulated entities the amount of the first semi-annual assessment no later than September 1 for the next fiscal year based on the Agency's approved Budget for payment by October 1. The second semi-annual notice to the regulated entities occurs in March for an April 1 payment. The system contains the data elements that constitute the Agency's annual Budget, including personnel and non-personnel costs.

The system is also used to provide a budget for actual comparison with budget execution data to report the status of the Agency's resources. This includes individual personnel costs by division/office and the division/offices specific non-personnel support costs consisting of contracts, supplies, and equipment.

### 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?	Existing agency non-personnel budgetary data (e.g., contracts for services and equipment, travel, training for staff) is collected including future year requirements; individual personnel cost data by name/division that consists of employees' names, Position Assigned Number (PAN/Employee ID), compensation related information, employee designation, and Agency internal assignments.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	Non-personnel budgetary data is obtained from existing budget formulation reports, budget execution reports from the official accounting system, and personnel data is obtained from the payroll system.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	All data is used to formulate the cost of Agency operations at the division and Agency level to enable the Agency to assess the regulated entities per regulation. The system will also be used to compare against approved division level budgets to execution costs.

1.4	How is the information provided to or otherwise obtained by the System/Collection?	Data is provided through manual input from divisions or uploaded by OBFM staff. Official accounting data (execution data) will be uploaded through a SFTP site in coordination with FHFA's accounting service provider, Bureau of Fiscal Services.
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>	SSN are not collected or used by the system.

## 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?	FHFA will use the data to develop the annual B5.2 (Budget and Financial Management Records) for the Agency and the budget execution reporting during the fiscal year.
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.	Customer controls and system access are managed by the system administrator. System access is limited to budgetary data for an individual's division based on their role in the organization and approval by division management. Divisions are limited to access their own non-personnel budgets and execution data and are not authorized to access Agency-wide data. Records management markings are included on all documents generated from the system. The data and access are similar to existing reporting provided to divisions from the official accounting system by division.

### 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?	Records are retained in accordance with records management and NARA directives. Agency financial records are maintained indefinitely.
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.	The retention schedule has been approved by FHFA - 5.2: Budget and Financial Management Records and 6.1a: Project Files.

### 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>	Information can be retrieved by an individual's name. <ul style="list-style-type: none"><li>• FHFA-2 Financial Management System;</li></ul>
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 system does not collect PII directly from individuals.
4.3	Is an individual's response to the request for information voluntary or mandatory?	N/A. This system does not collect PII directly from individual FHFA employees.
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?	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). Any inaccuracy can also be addressed by submitting a request to OHRM to correct payroll data.
-----	---	--

## 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"> <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>	Non-personnel budgets and budget execution data is shared with divisions submitting and managing the budgets and aggregated data is shared with senior Agency officials for decision making purposes. None of the data shared contains PII.
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>	Discrete itemized data is not shared outside of FHFA. Aggregated data reports from the system may be shared with OQA internal review staff, FHFA-OIG or GAO auditors based on data requests for specific audit requirements to support the Agency Budget and regulated entity assessments. The Assessment Table provided to the regulated entities contains the total Agency Budget amount only. FHFA provides OMB required budgetary data elements in accordance with Circular A-11 and provides aggregated budget authority level data by division to Bureau of Fiscal Services as part of the official accounting system. None of the data shared contains PII.
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>	No PII is shared.

## 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>	<p>No. Only authorized FHFA employees and contractors have access to information in OneStream. OneStream customer support can access the FHFA OneStream environment when FHFA provides access via a help desk ticket but are not exposed to customer data.</p> <p>The FHFA Customer Controls for OneStream for Government define procedures for requesting and granting access to the system, and for assigning roles based on the concept of least privilege.</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>None.</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 (RIM) training for use of FHFA systems at onboarding and annually thereafter. In addition, all FHFA users with elevated privileges receive specialized security training, and role-based privacy awareness training is required for those individuals whose work duties and responsibilities involve the collection, use, storage, access, or maintenance of PII.</p> <p>FHFA employee user training is offered to access the system for their respective division to update and manage their budgetary data and reporting. FHFA system administrators receive training from contractors and through the software vendor on administration and use of the system.</p>
6.4	<p>Describe the technical/administrative safeguards in place to protect the data.</p>	<p>OneStream received a FedRAMP agency authorization at the Moderate impact level on July 19, 2019. On April 7, 2023, FHFA's instance of their OneStream cloud environment was moved to the OneStream Government Community Cloud which is a more secured environment. Role-based access is enforced for all agency users. All agency customer information is encrypted at rest using TDE on all Microsoft Azure SQL databases.</p>

## 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.	Any intrusion or data loss would be limited to data similar to that available on a public website displaying government employee salaries ( <a href="http://www.fedsdatacenter.com">www.fedsdatacenter.com</a> ), individual amounts recorded as a payroll deduction (e.g. deductions for federal/state taxes, social security payment, health benefits, or retirement deductions) could be at risk if the system were compromised. Several of the amounts are driven by employment laws and not specific to a particular employee's election and could be roughly calculated based on the employee's salary.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	OBFM maintains a hard copy of financial and budgetary records for years prior to FY 2020 in a secure file room. For years FY 2021 and forward, digital data is maintained on access-controlled file folders on the Agency's IMS system for OBFM, specific to Budget and Accounting staff. There are no privacy risks as the data is maintained according to records retention requirements.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	No privacy risks exist as external data consists of aggregated amounts only. PII is not aggregated or shared externally.