



Privacy Impact Assessment (PIA) Template

**REASONABLE ACCOMMODATIONS AND PERSONAL ASSISTANCE
SERVICES INFORMATION SYSTEM**

(Name of the Information System or Information Collection)

May 2025
Date

System/Collection Overview

The Reasonable Accommodations and Personal Assistance Services Information System is an existing FHFA-operated system used to document the processing of requests for reasonable accommodations and personal assistance services for qualified FHFA employees and job applicants with disabilities, excluding Office of Inspector General (OIG) employees and job applicants. The purpose of the system is to allow FHFA to collect and maintain all records related to requests for reasonable accommodations and personal assistance services. The system also allows FHFA to track all actions, recommendations, and decisions throughout the process, as well as report the aggregated data to the appropriate entities to ensure compliance with applicable laws and regulations.

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?	An individual's name, position, and type of accommodation requested/granted (e.g., desk, keyboard) and/or assistance requested/granted (e.g., retrieving out of reach material, travel assistance) is maintained in the system. Additionally, medical information, such as an employee's limitations, duration of medical condition, etc., may also be maintained in the system.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The sources of the information may include individuals requesting an accommodation and/or assistance, FHFA management officials, and family members or appropriate representatives of employees or job applicants.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The information is used to facilitate the processing of requests for reasonable accommodations and personal assistance services, as well as meet recordkeeping and reporting requirements related to this process.

1.4	How is the information provided to or otherwise obtained by the System/Collection?	Individuals, their representatives, and FHFA management officials provide their name and other information as part of the request process. The information is electronically entered into FHFA forms and then manually entered into the system by the FHFA Reasonable Accommodation Coordinator.
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"> The business justification for collecting or using SSNs; The consequences if SSNs are not collected or used; and 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?	The purpose of the collection is to document requests for reasonable accommodation and personal assistance services. The information is used to track and report all actions, recommendations, and decisions.
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 is only granted to Office of Human Resource Management (OHRM) employees involved in processing requests.

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 for 3 years from the cut-off date, which is the date of the employee's separation from FHFA or the conclusion of any related appeal, whichever is later.
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. GRS 2.3.020.

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	<p>Is the information in this System/Collection retrieved by an individual's name or personal identifier such as an SSN or other identification?</p> <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.	<p>Yes, FHFA-18, Reasonable Accommodation and Personal Assistance Services Information System.</p>
4.2	<p>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.</p>	<p>A Privacy Act Statement describing FHFA's purpose for collecting the information is at the bottom of the relevant forms that are used to collect the information. Direct notice is also provided to employees if they are not provided a form. Notice is also provided via the above-referenced SORN.</p>
4.3	<p>Is an individual's response to the request for information voluntary or mandatory?</p>	<p>The response to the request for information is voluntary.</p>
4.4	<p>What are the consequences if an individual declines to provide the information?</p>	<p>An individual may not be considered for an accommodation or service if the requested information is not provided.</p>
4.5	<p>What are the procedures that allow individuals to gain access to their information?</p>	<p>Individuals can gain access to their information by contacting FHFA's Privacy Office as set forth in the SORN, FHFA-18 and FHFA's Privacy Act Regulations, 12 CFR 1204.</p>
4.6	<p>What are the procedures for correcting inaccurate or erroneous information?</p>	<p>Inaccurate or erroneous information can be corrected by contacting FHFA's Reasonable Accommodation Coordinator or the Privacy Office as set forth in the SORN, FHFA-18 and FHFA's Privacy Act Regulations, 12 CFR 1204.</p>

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>Yes. The information collected may be shared with other OHRM offices if necessary to perform human resources functions. Information may also be provided to FHFA’s Equal Employment Opportunity (EEO) Office if required to perform EEO-related functions and to the Office of General Counsel if legal guidance is needed when processing a request. The Office of Facilities Operations Management (OFOM) and the Office of Chief Information Officer may review non-routine requested accommodations related to their assigned functions to assess the feasibility and reasonableness of an accommodation prior to a decision to grant or deny such accommodation.</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>Information is shared with the Equal Employment Opportunity Commission (EEOC), in accordance with Management Directive 715 (MD-715). The reasonable accommodation and personal assistance services information provided to EEOC is aggregated (e.g., number of employees of a particular sex or race) and therefore does not contain PII. That information is provided to assist EEOC with guidance and oversight of the program, including determinations of any deficiencies in the agency’s EEO program. Information may also be shared with other third parties who are legally required to access the information for business-related purposes.</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 does not apply, identify the legal authority that permits the sharing outside FHFA.	<p>Yes. FHFA is permitted to share certain information permitted by the routine uses noted in SORN, FHFA-18. FHFA is also required to report the aggregated information to the EEOC, as noted in FHFA-18.</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>Yes. An FHFA contractor is granted access to system for work duties related to processing cases. OIG may also be granted access by the system owner if necessary for OIG-related work. Otherwise, only those involved in processing/ decision making are granted access to the system by the system owner and 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).</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 (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 regularly involve the 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>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 files access and modification, 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.</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.	The amount of information collected is not large, but the type of information can be sensitive as it concerns the nature of an individuals' request. The risks of losing or compromising this data is mitigated by FHFA only granting access to the system to those individuals who are responsible for processing the requests and/or making decisions related to the requests. Additionally, because the system is developed and hosted by FHFA, the risk of data loss due to hacking or other nefarious means is decreased.
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	The risks associated with data retention is low. Data will only remain in the system for 3 years after the employee is separated from service at FHFA or the exhaustion of any appeal, whichever is later. Any risks are mitigated by limiting access to the system. Access is prohibited unless approved by the system owner.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	For information shared with the EEOC, the privacy risk to the individual is minimal. The information is aggregated and all PII is removed before sharing it with external entities. FHFA's IT Security Branch has established procedures for securely managing access to the system and for reviewing user activity for indications of inappropriate use.