



Privacy Impact Assessment (PIA) Template

FOIAXPRESS

(Name of the Information System or Information Collection)

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Date

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System/Collection Owner(s)			
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System/Collection Overview			
<p>FOIAXpress is an existing commercial-off-the-shelf web-based system used to assist FHFA in receiving, processing, tracking, and managing Freedom of Information Act (FOIA) and Privacy Act requests and appeals received from the public and providing reports of the same to the U.S. Department of Justice (DOJ). The system is also used to process and maintain FHFA documents that are requested in FOIA and Privacy Act requests. The FOIAXpress system includes the Public Access Link (PAL), which is a web portal that allows members of the public to electronically submit and track the status of their FOIA and Privacy Act requests. Requesters are also able to submit their requests through FOIA.gov, a National FOIA Portal that is owned and operated by the DOJ. Requests submitted through FOIA.gov are automatically forwarded and uploaded to FHFA's FOIAXpress system. FOIAXpress is owned and operated by a third-party vendor who maintains and securely hosts FHFA data.</p>			

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?	Name, contact information (i.e., address, email, and phone numbers), and other identifying information provided by the requester.
1.2	What or who are the sources of the information provided to FHFA and included in the System/Collection?	The information is provided directly by the individual FOIA and/or Privacy Act requester.
1.3	For what purpose is the information being collected, used, disseminated, or maintained?	The purpose is to facilitate the processing of requests and to contact and communicate with the requester.
1.4	How is the information provided to or otherwise obtained by the System/Collection?	The information is provided by the requester through email, facsimile, U.S. mail, Public Access Link, and https://www.foia.gov .

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
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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 information will be used to track and contact requesters. Also, information may be used to verify someone’s identity for a Privacy Act request.
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. Individuals that require access have a business need to do so or use of the system is a core function of their job duties.

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 records file plan reflects the following disposition schedule: Destroy or delete 6 years after final agency action or 3 years after final adjudication.
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-4.2.020, which can be found here: https://intranet.fhfa.gov/downloader.ashx?objectid=8490400 .

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-13, Freedom of Information and Privacy Act Records.</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>Notice is provided by SORN FHFA-13, which can be accessed via our FOIA/Privacy webpage.</p>
4.3	<p>Is an individual's response to the request for information voluntary or mandatory?</p>	<p>Voluntary.</p>
4.4	<p>What are the consequences if an individual declines to provide the information?</p>	<p>If an individual declines to provide the information, they will not be able to file a FOIA or Privacy Act request with FHFA.</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 directing a request to the Privacy Act Officer in accordance with SORN, FHFA-13 and FHFA's Privacy Act Regulation, 12 CFR 1204.</p>
4.6	<p>What are the procedures for correcting inaccurate or erroneous information?</p>	<p>Individuals can direct requests to correct inaccurate or erroneous information to the Privacy Act Officer in accordance with SORN, FHFA-13 and FHFA's Privacy Act Regulation, 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>For FOIA requests, information is shared with all offices in FHFA, as needed, in order to access the records that are responsive to the request. The information shared is generally the nature of the request and the requesters name and affiliation, if applicable. For Privacy Act requests, information about the individual making the request is only shared with those who need the information to process the request. The particular office(s) or division(s) with which the information is shared depends on the subject matter of the request.</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>To adequately respond to a FOIA or Privacy Act request. FHFA may share information, including PII, with other federal agencies.</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. The routine uses are set forth in the SORN, FHFA-13.</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 OIG will not have access to this system.</p> <p>FHFA contractor support personnel will have access to provide FOIA or Privacy Act processing support. Their access is controlled by the system administrator pursuant to internal control access procedures, and their use is restricted by FHFA’s rules of behavior.</p>

		The relevant procedures are documented in FHFA FOIA Office FOIAXpress Access Procedures (March 2023).
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.	None.
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 attend Information Security, FOIA, Privacy, and Records and Information Management (RIM) training at new employee onboarding. Additionally, these trainings are conducted annually for all employees and specific role-based training is provided to the system COR and users annually.
6.4	Describe the technical/administrative safeguards in place to protect the data.	AES encryption is used to encrypt both the database and backup tapes. AES encryption is compliant with FIPS 140-2 with encryption strength of 256.

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 risk associated with the amount and type of information collected to an individual's privacy is the loss or compromise of their contact information. To avoid unauthorized access or disclosure of this information, access to FOIAXpress is limited to only the FOIA/Privacy professionals who need to access the system to complete their professional responsibilities. Access to the system is permitted only by FHFA's single sign on..
7.2	Discuss the risks associated with the length of time data is retained and how those risks are mitigated.	The risks associated with the length of time are that information is maintained for up to 6 years which means it is susceptible to loss or compromise over a significant period of time. Such risks are mitigated by limited access, password controls, logging activities, etc. to monitor access to information.
7.3	Given the external sharing, explain the privacy risks to the individual and describe how those risks are mitigated.	The privacy risks associated with external sharing are the loss of information. The risks are mitigated by mailing information or emailing, with password protected files.