

# Privacy Impact Assessment for Ginnie Mae Contractors

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Integrated Pool Management System (IPMS)

Information Management Division

February 2, 2007

Version 1.1

## Introduction

The purpose of this Privacy Impact Assessment is to help the Information Management Division (IMD) identify Ginnie Mae's information systems that process, store, use, and distribute data covered under the Privacy Act of 1974.

Ginnie Mae is responsible for ensuring the privacy and confidentiality of Personally Identifiable Information (PII) it collects, maintains, or disseminates from or about members of the public. Personally Identifiable Information includes information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors.)

### Instructions:

**1. Fill out Part 1 of this study.**

You may fill out the study electronically, but you must print it out to sign and mail it.

**2. If you check yes to any of the questions about PII data in Section c of Part 1, you must also fill out Part 2.**

Please be as descriptive as possible in answering the questions. You may use additional paper if necessary.

**3. Sign and date the form, and then mail it to the following address via a secure mail service:**

Ginnie Mae  
Attention: Chitranjan Khandpur  
451 7th Street SW  
Room # B-133  
Washington, DC 20410

If your organization processes, stores, uses, or distributes PII data, a security analyst working with the Ginnie Mae Information Management Division (IMD) will contact you to arrange a brief interview regarding how the PII data is being protected from unauthorized use, disclosure, or loss. These interviews usually last less than an hour, and you are not required to travel (the security team will come to your site).

Thank you for helping protect Ginnie Mae PII/privacy data.

# Part 1: Privacy Data Determination

Please review Section a and fill out Sections b and c of Part 1.

## a. System Information

If any information is incorrect in this section, please strike through it, correct it, and then initial the correction.

System Information	
System Name	Integrated Pool Management System (IPMS)
System Description	The Integrated Pool Management System functions as the core processing system for Ginnie Mae pool and MBS certificates/book entry positions. It contains pool, investor and issuer information.
Name of System Provider	Bank of New York
Address of System Provider	Jumedia Buchner 4 New York Plaza, 17 <sup>th</sup> Floor New York, NY 10004
Ginnie Mae Information Owner	Thomas Weakland GTR, SVP Program Operations

## b. System Provider Contact Information

Please enter the names and contact information for those personnel with primary responsibility for the Ginnie Mae information system.

Contact Name	Title	Phone	Email
Brian Lavelle	Vice-President	(212) 623-6050	brian.lavelle@bankofny.com
Alan Taubman	Vice-President	(212) 623-6504	alan.taubman@bankofny.com
Marc Sandler	Vice-President	(212) 623-6509	marc.sandler@bankofny.com

**c. PII Data Processed by System**

What Personally Identifiable Information (PII) is collected or stored on your Ginnie Mae information system(s)? Please check yes or no in the box provided.

Type of PII Data	Yes	No
1. Name	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Social Security Number (SSN)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Home address	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Home telephone	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Personal email address	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Date of birth	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Driver's license/state ID number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Race (e.g., Caucasian, African-American, American Indian, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Religion	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Ethnicity/national origin (e.g., Canadian, South African, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Biometric information (e.g., fingerprint, voiceprint, photograph, etc.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Financial information (loan number, credit score, credit card number, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
13. Passport number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14. Permanent and Alien registration number (Green Card)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15. Insurance policy number	<input type="checkbox"/>	<input checked="" type="checkbox"/>
16. Digital/electronic signature information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
17. Medical/psychological information	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18. Criminal history	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19. Mother's maiden name	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20. Drug test results	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21. Marital status	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23. Education history	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24. Other (please specify):	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Part 2: Privacy Data Details

If you answered yes to any question in Part 1, Section c of this form, please answer the questions below as completely as possible.

1. **What PII information does your Ginnie Mae system process, store, or collect?**  
Personally identifiable information (PII) includes information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors.)  
Mortgagee name, address, loan number and investors name, address and social security/tax ID number
  
2. **Does your Ginnie Mae system process, store, or collect PII data about more than 10 individuals?**  
 Yes  No
  
3. **On what type of media is the PII data stored or collected? (For example, is the information collected via the Web, email, CDs, paper forms, etc.?)**  
Mortgagee name, address and loan number is collected via a secure network or on the web. Investor's name, address and social security/tax ID number is stored on a mainframe
  
4. **Where is the server, media, or storage mechanism on which the PII data is stored?**  
The network servers are located at 4 New York Plaza, New York, NY and the mainframe is in Wilmington DE
  
5. **What are the sources of the PII data?**  
Mortgagee name, address and loan number come from issuers. Investor's name, address, and social security/tax ID numbers come from broker dealers.
  
6. **Why is the PII data stored or collected?**  
Mortgagee data is needed for the purpose of identification. The investor's information is also needed for identification and payment purposes.
  
7. **What is the current / intended use of the PII data?**  
Investor data is used to know who to make the payment to. Mortgagee data is sent to the

Data Collection contractor for processing.

8. With whom is the PII data shared (other agencies, organizations, systems, etc.)?

Ginnie Mae's Data Collection contractor.

9. How is the PII data secured?

The data is stored on the mainframe in a segregated LPar, to which access is restricted to BNY employees whose job descriptions require access to that data and to employees of Ginnie Mae. In the distributed environment, the data is stored on SAN unit on an isolated network. Access to the data on the SAN unit to which access is restricted to BNY employees whose job descriptions require access to that data. All data is stored in secured facilities and card key access is required, at a minimum.

10. Is this IT system a System of Record?

A System of Record is any group of records under the control of an agency from which information is retrieved by the name of an individual or by some identifying number, symbol, or other identifying particular assigned to the individual. For example, a system that collects credit scores of individuals and is searchable by name or SSN would be a System of Record.

Yes  No

Additional explanation if required:

11. Is this system part of another System of Record?

If your system receives a feed containing PII data from another agency's system that collects the PII data from the public, then that other agency's system is the System of Record and they are the sponsor of the collection. For example, if your system uses data from FHA that the agency has collected directly from the public, then your system is not the System of Record (the FHA system is).

Yes  No

If yes, provide name of the System of Record and sponsor:

12. Has a Systems of Record Notice (SORN) been published/approved by OMB for the system?

A SORN is a notice that is published in the Federal Register whenever a new System of Record is implemented or an existing System of Record has modifications that impact the privacy data it collects.

Yes  No

If yes, provide OMB form number and name:

13. Is the system currently being modified or will it be modified this year?

If yes, describe modification.

Yes  No

If yes, describe modification:

14. If the system is being modified, will the SORN require amendment or revision?

A revised notice must be published in the Federal register if the planned modifications to the System of Record will impact the privacy data the system collects.

Yes  No

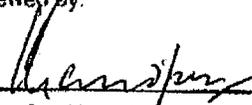
If yes, explain:

Privacy Impact Assessment

Based on the authority of contractor representative, all data captured in this document is current and accurate.

 1/25/2007  
\_\_\_\_\_  
Signature Date

Brian Lavelle VP - Technology  
\_\_\_\_\_  
Printed Name Title

Reviewed by:  
 2/16/07  
\_\_\_\_\_  
Chitranjan Khandpur Date  
Ginnie Mae Chief Privacy Officer

Reviewed by:  
 2/16/07  
\_\_\_\_\_  
Deborah V. Holmes Date  
Ginnie Mae Chief Information Officer