

Privacy Impact Assessment for Ginnie Mae Contractors

Policy and Financial Analysis Model (PFAM)

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	Policy and Financial Analysis Model (PFAM)
System Description	This system supports the preparation of the Ginnie Mae annual budget and provides documentation of the wind down analysis.
Name of System Provider	Ahmad Associates , BearingPoint Hosting Operations
Address of System Provider	1660 International Drive McLean, VA 22102
Ginnie Mae Information Owner	Maria McQueen (GTR) Michael Najjum, SVP Office of Finance

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
Timothy Davis	Managing Director	703-747-4044	Timothy.Davis@BearingPoint.com
Michael Scott	Manager	703-747-6671	Mike.Scott@BearingPoint.com
Joel Kasprik	Senior Consultant	703-747-5837	Joel.Kasprik@BearingPoint.com
Alan Trombley	Senior Analyst	703-747-5652	Alan.Trombley@BearingPoint.com
Charan Ahluwalia	Senior Manager	703-893-9644	cahlwalia@aalcpas.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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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.)
The PFAM model processes and stores names, addresses, social security numbers, loan numbers and ethnicities for individuals who are obligors for VA and FHA mortgages.
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.?)**
The information is inputted into the PFAM system via CD and magnetic tape.
4. **Where is the server, media, or storage mechanism on which the PII data is stored?**
The server is located in a secure data center operated by BearingPoint Hosting Operations in McLean VA. The media is stored in a locked storage unit at BearingPoint's Headquarters in McLean VA.
5. **What are the sources of the PII data?**
FHA Single Family Data Warehouse, Veterans Administration GIL.
6. **Why is the PII data stored or collected?**
The PII data is stored as historical data and is reused for yearly runs of the PFAM system.
7. **What is the current / intended use of the PII data?**
PII data is currently used to match loan level information between FHA, VA and GNMA data.
8. **With whom is the PII data shared (other agencies, organizations, systems, etc.)?**

No data is shared.

9. How is the PII data secured?

The PII data is secured by both physical and electronic means. The server is stored in a secure data center facility and is remotely accessible only by authorized users via a secure VPN. Media containing data is stored in a secure building in a secure cabinet.

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:

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

Ahluwalia June 13, 2007
Signature Date

Charan Ahluwalia Senior Manager
Printed Name Title

Reviewed by:
[Signature] 6/18/07
Chitranjan Khanapur Date
Ginnie Mae Chief Privacy Officer

Reviewed by:
[Signature] 6/18/07
Deborah V. Holmes Date
Ginnie Mae Chief Information Officer