

**U.S. Department of Housing and
Urban Development**

Office of Policy Development & Research

Housing Counseling Research Data Files

Privacy Impact Assessment

August 26, 2008

DOCUMENT ENDORSEMENT

I have carefully assessed the Privacy Impact Assessment (PIA) for **Housing Counseling Data Research Files**. This document has been completed in accordance with the requirement set forth by the [E-Government Act of 2002](#) and [OMB Memorandum 03-22](#) which requires that "Privacy Impact Assessments" (PIAs) be conducted for all new and/ or significantly altered IT Systems, and Information Collection Requests.

ENDORSEMENT SECTION

Please check the appropriate statement.

- The document is accepted.**
 The document is accepted pending the changes noted.
 The document is not accepted.

Based on our authority and judgment, the data captured in this document is current and accurate.

[/S/ Marina Myhre](#)

**SYSTEM OWNER, MARINA MYHRE
THE PROGRAM EVALUATION DIVISION
OFFICE OF POLICY DEVELOPMENT AND RESEARCH**

[08/28/08](#)

Date

[/S/ Mark Shroder](#)

**PROGRAM AREA MANAGER, MARK SHRODER, ACTING DIRECTOR OF
THE PROGRAM EVALUATION DIVISION
OFFICE OF POLICY DEVELOPMENT AND RESEARCH**

[08/28/08](#)

Date

[N/A](#)

**DEPARTMENTAL PRIVACY ADVOCATE
OFFICE OF THE CHIEF INFORMATION OFFICER
U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Date

[/S/ Donna Robinson-Staton](#)

**DONNA ROBINSON-STATON, DEPARTMENTAL PRIVACY ACT
OFFICER
OFFICE OF THE CHIEF INFORMATION OFFICER
U. S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

[09/09/08](#)

Date

TABLE OF CONTENTS

| | |
|--|-----------|
| DOCUMENT ENDORSEMENT | 2 |
| ENDORSEMENT SECTION | 2 |
| TABLE OF CONTENTS | 3 |
| SECTION 1: BACKGROUND..... | 4 |
| Importance of Privacy Protection – Legislative Mandates: | 4 |
| What is the Privacy Impact Assessment (PIA) Process? | 5 |
| Who Completes the PIA?..... | 5 |
| When is a Privacy Impact Assessment (PIA) Required?..... | 5 |
| What are the Privacy Act Requirements?..... | 6 |
| Why is the PIA Summary Made Publicly Available? | 6 |
| SECTION 2 – COMPLETING A PRIVACY IMPACT ASSESSMENT..... | 7 |
| Question 1: Provide a brief description of what personal information is collected..... | 7 |
| Question 2: Will any of the personally identifiable information be accessed remotely or physically removed? | 9 |
| Question 3: Type of electronic system or information collection..... | 10 |
| Question 4: Why is the personally identifiable information being collected? How will it be used? | 11 |
| Question 5: Will you share the information with others? (e.g., another agency for a programmatic purpose or outside the government)? | 13 |
| Question 6: Can individuals “opt-out” by declining to provide personal information or by consenting only to particular use (e.g., allowing their financial information to be used for basic rent eligibility determination, but for not for sharing with other government agencies)? | 13 |
| Question 6: How will the privacy of the information be protected/ secured? What are the administrative and technological controls?..... | 14 |
| Question 7: If privacy information is involved, by what data element(s) is it retrieved from the system?..... | 15 |
| SECTION 3: DETERMINATION BY HUD PRIVACY ADVOCATE | 16 |

FINAL/APPROVED

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PRIVACY IMPACT ASSESSMENT (PIA) FOR:

HOUSING COUNSELING RESEARCH DATA FILES

OMB Unique Identifier for IT System(s): N/A and Insert PCAS #: N/A

AUGUST 26, 2008

NOTE: See Section 2 for PIA answers, and Section 3 for Privacy Act Officer's determination.

SECTION 1: BACKGROUND

Importance of Privacy Protection – Legislative Mandates:

HUD is responsible for ensuring the privacy and confidentiality of the information it collects on members of the public, beneficiaries of HUD programs, business partners, and its own employees. These people have a right to expect that HUD will collect, maintain, use, and disseminate identifiable personal information only as authorized by law and as necessary to carry out agency responsibilities.

The information HUD collects is protected by the following legislation and regulations:

- [Privacy Act of 1974, as amended](#) affords individuals the right to privacy in records that are maintained and used by Federal agencies. (See <http://www.usdoj.gov/foia/privstat.htm>; see also [HUD Handbook 1325.1 at www.hudclips.org](#));
- Computer Matching and Privacy Protection Act of 1988 is an amendment to the Privacy Act that specifies the conditions under which private information may (or may not) be shared among government agencies. (See <http://www.usdoj.gov/foia/privstat.htm>);
- [Freedom of Information Act of 1966, as amended](#) (http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) provides for the disclosure of information maintained by Federal agencies to the public, while allowing limited protections for privacy. See also [HUD's Freedom of Information Act Handbook \(HUD Handbook 1327.1 at www.hudclips.org\)](#));
- [E-Government Act of 2002](#) requires Federal agencies to conduct Privacy Impact Assessments (PIAs) on its electronic systems. (See http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf; see also the summary of the E-Government Act at http://www.whitehouse.gov/omb/egov/pres_state2.htm);
- [Federal Information Security Management Act of 2002](#) (which superseded the Computer Security Act of 1987) provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets, etc. See also the codified version of Information Security

regulations at [Title 44 U.S. Code chapter 35 subchapter II \(http://uscode.house.gov/search/criteria.php\)](http://uscode.house.gov/search/criteria.php); and

- [OMB Circular A-130, Management of Federal Information Resources, Appendix I \(http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf\)](http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf) defines Federal Agency responsibilities for maintaining records about individuals.

Access to personally identifiable information will be restricted to those staff that has a need to access the data to carry out their duties; and they will be held accountable for ensuring privacy and confidentiality of the data.

What is the Privacy Impact Assessment (PIA) Process?

The Privacy Impact Assessment (PIA) is a process that evaluates issues related to the privacy of personally identifiable information in electronic systems. See background on PIAs and the 7 questions that need to be answered, at: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>. Personally identifiable information is defined as information that actually identifies an individual, e.g., name, address, social security number (SSN), or identifying number or code; or other personal/ sensitive information such as race, marital status, financial information, home telephone number, personal e-mail address, etc. Of particular concern is the combination of multiple identifying elements. For example, knowing name + SSN + birth date + financial information would pose more risk to privacy than just name + SSN alone.

The PIA:

- Identifies the type of personally identifiable information in the system (including any ability to combine multiple identifying elements on an individual);
- Identifies who has access to that information (whether full access or limited access rights); and
- Describes the administrative controls that ensure that only information that is necessary and relevant to HUD's mission is included.

Who Completes the PIA?

Both the program area System Owner and IT Project Leader work together to complete the PIA. The System Owner describes what personal data types are collected, how the data is used, and who has access to the personal data. The IT Project Leader describes whether technical implementation of the System Owner's requirements presents any risks to privacy, and what controls are in place to restrict access of personally identifiable information.

When is a Privacy Impact Assessment (PIA) Required?

- 1. New Systems:** Any new system that will contain personal information on members of the public requires a PIA, per OMB requirements (this covers both major and non-major systems).

2. Existing Systems: Where there are significant modifications involving personal information on members of the public, or where significant changes been made to the system that may create a new privacy risk, a PIA is required.

3. Information Collection Requests, per the Paperwork Reduction Act (PRA): Agencies must obtain OMB approval for new information collections from ten or more members of the public. If the information collection is both a new collection and automated, then a PIA is required.

What are the Privacy Act Requirements?

Privacy Act. The [Privacy Act of 1974](http://www.usdoj.gov/foia/privstat.htm), as amended (<http://www.usdoj.gov/foia/privstat.htm>) requires that agencies publish a Federal Register Notice for public comment on any intended information collection. Privacy Act Systems of Records are created when information pertaining to an individual is collected and maintained by the Department, and is retrieved by the name of the individual or by some other identifying number, symbol, or other identifying particular assigned to an individual. The [E-Government Act of 2002](#) requires PIAs for electronic systems as well as information collection requests that are automated. So, there is a relationship between the new PIA requirement (when automation is involved) and the long-standing Privacy Act System of Records Notices (for both paper-based and automated records that are of a private nature). For additional information, contact the Departmental Privacy Act Officer in the Office of the Chief Information Officer.

Why is the PIA Summary Made Publicly Available?

The E-Government Act of 2002 requires that the analysis and determinations resulting from the PIA be made publicly available. The Privacy Advocate in HUD's Office of the Chief Information Officer (OCIO) is responsible for publishing the PIA summary on HUD's web site. See: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

SECTION 2 – COMPLETING A PRIVACY IMPACT ASSESSMENT

Please submit answers to the Departmental Privacy Act Officer in the Office of the Chief Information Officer (OCIO). If any question does not apply, state Not Applicable (N/A) for that question, and briefly explain why it is not applicable.

Program Area: Program Evaluation Division, RRE, Office of Policy Development & Research

Subject matter expert in the program area: Marina L. Myhre, Office of Policy Development and Research, Program Evaluation Division, Program Evaluation Division, (202) 402-5705.

Program Area Manager: Todd M. Richardson, Office of Policy Development and Research, Program Evaluation Division, (202) 402-5706.

IT Project Leader: N/A, not an internal HUD system so no IT Project Leader

For IT Systems:

- **Name of system:** Housing Counseling Research Data Files
- **PCAS #:** N/A
- **OMB Unique Project Identifier #:** N/A
- **System Code:**

For Information Collection Requests:

- **Name of Information Collection Request (ICR):** Data Collection for the Housing Counseling Outcome Evaluation is the information collection request that is in process of being approved by OMB with the expectation that all responses/data collected will be automated. Expected implementation date of the off-site (on contractors' computers) automated system is October 1, 2008.
- **OMB Control #:** Will be provided when OMB approves the ICR

Question 1: Provide a brief description of what personal information is collected.

The Housing Counseling Research Data Files are necessary for the execution of HUD's Housing Counseling Program. HUD's Office of Policy Development and Research (PD&R) is conducting an outcome evaluation of the components of its Housing Counseling Program related to clients seeking assistance to either purchase a home (pre-purchase clients) to resolve or prevent mortgage delinquency (foreclosure mitigation clients).

The study is designed to gather statistically accurate information on outcomes realized by the clients of the participating housing counseling agencies. The study focuses on two groups of clients: (1) clients seeking assistance to purchase a home (pre-purchase clients) and (2) clients seeking to resolve or prevent a mortgage delinquency (foreclosure mitigation clients). Up to thirty housing counseling agencies at random will be recruited to participate in this study. The selected agencies will provide samples of data from each of the two groups, selected. The data collected through the study will support analysis of not just the frequency of different client

outcomes, but also the association between these outcomes and client characteristics, client circumstances, and the extent of services received.

Additionally, the proposed study will fulfill two important needs for HUD and the counseling field. First, it will provide systematic information on the outcomes realized by counseling clients and how these outcomes vary with the characteristics of clients and the services they receive. The study will also lay the groundwork for a subsequent pre-purchase impact evaluation by testing data collection procedures to be used to enroll clients, gather information on the characteristics of the services they receive, and track them over time.

If this automated system (or Information Collection Request) involves personally identifiable information on members of the public, then **mark any of the categories that apply below:**

Personal Identifiers:

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Name |
| <input checked="" type="checkbox"/> | Social Security Number (SSN) |
| <input checked="" type="checkbox"/> | Other identification number (specify type): Counseling Agency ID number |
| <input checked="" type="checkbox"/> | Birth date |
| <input checked="" type="checkbox"/> | Home address |
| <input checked="" type="checkbox"/> | Home telephone |
| <input checked="" type="checkbox"/> | Personal e-mail address |
| | Fingerprint/ other "biometric" |
| | Other (specify): |
| | None |
| | Comment: |

Personal/ Sensitive Information:

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Race/ ethnicity |
| <input checked="" type="checkbox"/> | Gender/ sex |
| <input checked="" type="checkbox"/> | Marital status |
| <input checked="" type="checkbox"/> | Spouse name |
| <input checked="" type="checkbox"/> | # of children |
| <input checked="" type="checkbox"/> | Income/ financial data (specify type of data, such as salary, Federal taxes paid, bank account number, etc.): Gross monthly income, amount in savings, amount in retirement accounts, monthly rent paid, monthly utilities paid, mortgage payment status |
| <input checked="" type="checkbox"/> | Employment history: Current work status, employment history |
| <input checked="" type="checkbox"/> | Education level: |
| | Medical history/ information |
| | Disability |
| | Criminal record |
| <input checked="" type="checkbox"/> | Other (specify): Born in U.S.; English as primary language; homeownership status; foreclosure status; name, address, and telephone numbers of two relatives or friends for future follow-up |

| | |
|--|----------|
| | None |
| | Comment: |

Question 2: Will any of the personally identifiable information be accessed remotely or physically removed?

| | Yes | No |
|--|-------------------------------------|--------------------------|
| If yes, Proceed to answering the following questions. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Have the security controls been reviewed and approved by the Information Security Officer? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| <p>What security controls are in place to protect the information (e.g., encryptions)?</p> <p>Counseling agencies will be instructed to collect all consent forms and baseline questionnaires from study participants once they are completed and place them in a sealed envelop and store them in a locked cabinet in a locked office.</p> <p>Once a week the sealed envelopes containing the consent forms and baseline questionnaires will be sent via overnight mail service with package tracking to our subcontractor IMPAQ International at their offices in Columbia, MD. The consent forms will then scanned into electronic files that will be encrypted and then provided to Abt Associates via a secure, password protected HTTPS site. When the consent forms are used to obtain credit reports for the study, a copy of the consent form will be provided using the same secure HTTPS site and encrypted files to the agency that obtains the credit reports. The baseline questionnaires will be entered into a secure electronic database that is encrypted at the database level. Both the consent forms and baseline questionnaires will then be stored at a secure off-site facility for the duration of the project. Once the study is completed, and in keeping with any provisions of the contract governing the retention of records related to the project, the paper files will be shredded.</p> <p>All desktop and laptop computers at IMPAQ as well as the database developed for this project will be protected by IMPAQ's security infrastructure. All PII in the database will be encrypted at the database level. All other data will be entered into the database by counselors via a secure website so that all data transmitted over the Internet are encrypted. The only PII that counselors will have access to read will be the name, address, phone number, and email address of the study participants at their agencies.</p> <p>Once the project is over, a copy of the data without any Social Security numbers or dates of birth will be provided to HUD by the contractor. The contractor will then destroy the data in their possession in accordance with the specifications in the contract.</p> | | |
| <p>What HUD approved application is used to grant remote access (e.g., VPN, Citrix)?</p> <p>N/A. Counselors would access the system through the Internet via Internet Explorer web browser. The system requires a username and password to gain access, and only authorized counselors or staff at each agency would be provided with a username and password.</p> | | |

| |
|---|
| <p>Is there a policy in place restricting remote access from certain locations outside the Department (For example: Policy may permit remote access, but prohibits access from a particular place; such as, Kinko's/Starbucks) or is remote access permitted from all areas outside the Department?</p> <p>Yes, no remote access is allowed. Any person from a given counseling agency would be able to see only data entered into the system by counselors from that same agency. A counselor from a given agency would not be able to see any data entered by counselors at other agencies.</p> |
| <p>Is there a policy that identifies "if" or "if not" downloading and remote storage of this information is allowed (For example: Policy may permit remote access, but prohibit downloading and local storage)?</p> <p>Yes, counseling agencies will not be able to download data from the database. They will be able to access the database remotely, but the only personally identifiable information they can access will be the names, addresses, phone numbers, and emails of the study participants from their agency. Refer to security controls.</p> |
| <p>Comment:</p> |

Question 3: Type of electronic system or information collection.

A. If a new electronic system (or one in development): Is this a new electronic system (implemented after April 2003, the effective date of the E-Government Act of 2002)?

| | Yes | No |
|--|-------------------------------------|--------------------------|
| If yes, please proceed to answering the following questions. | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Does the system require authentication? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Is the system browser-based? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Is the system external-facing (with external users that require authentication)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

B If an existing electronic system: Mark any of the following conditions for your existing system that OMB defines as a "trigger" for requiring a PIA (if not applicable, mark N/A):

| | |
|-----|--|
| X | Conversion: When paper-based records that contain personal information are converted to an electronic system <i>Abt Associates has created a baseline questionnaire for counseling clients to fill out. Current plans are for the counseling clients to fill this in by hand, counseling agency staff will store it in a locked file cabinet in a locked office, and then mail all collected forms weekly by FedEx or other secure and trackable carrier to Abt or IMPAQ for entry into the CSDS database. This paper form is simply referred to as the "Baseline Questionnaire".</i> |
| N/A | From Anonymous (Non-Identifiable) to "Non-Anonymous" (Personally Identifiable): When any systems application transforms an existing database or data collection so that previously anonymous data becomes personally identifiable |

| | |
|-----|--|
| N/A | Significant System Management Changes: When new uses of an existing electronic system significantly change how personal information is managed in the system. (Example #1: when new “relational” databases could combine multiple identifying data elements to more easily identify an individual. Example #2: when a web portal extracts data elements from separate databases, and thereby creates a more open environment for exposure of personal data) |
| N/A | Merging Databases: When government databases are merged, centralized, matched, or otherwise significantly manipulated so that personal information becomes more accessible (with special concern for the ability to combine multiple identifying elements) |
| N/A | New Public Access: When <u>new</u> public access is given to members of the public or to business partners (even if the system is protected by password, digital certificate, or other user-authentication technology) |
| N/A | Commercial Sources: When agencies systematically incorporate into databases any personal data from commercial or public sources (ad hoc queries of such sources using existing technology does not trigger the need for a PIA) |
| N/A | New Inter-agency Uses: When agencies work together (such as the federal E-Gov initiatives), the lead agency should prepare the PIA |
| N/A | Business Process Re-engineering: When altering a business process results in significant new uses, disclosures, or additions of personal data |
| N/A | Alteration in Character of Data: When adding new personal data raises the risks to personal privacy (for example, adding financial information to an existing database that contains name and address) |

C. If an Information Collection Request (ICR): Is this a new Request that will collect data that will be in an automated system? Agencies must obtain OMB approval for information collections from 10 or more members of the public. The E-Government Act of 2002 requires a PIA for ICRs only if the collection of information is a new request and the collected data will be in an automated system.

| | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Yes, this is a new ICR and the data will be automated |
| <input type="checkbox"/> | No, the ICR does not require a PIA because it is not <u>new</u> or <u>automated</u>) |
| <input type="checkbox"/> | Comment: |

Question 4: Why is the personally identifiable information being collected? How will it be used?

Mark any that apply:

Homeownership:

| | |
|-------------------------------------|--|
| <input type="checkbox"/> | Credit checks (eligibility for loans) |
| <input type="checkbox"/> | Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information |
| <input type="checkbox"/> | Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD) |
| <input checked="" type="checkbox"/> | Loan default tracking: Only for the purpose of tracking the outcomes of the housing |

| | |
|---|--|
| | counseling administered to the counseling clients participating in the study. |
| | Issuing mortgage and loan insurance |
| X | Other (specify): Soft credit checks for the purpose of evaluating client outcomes of pre-purchase and foreclosure mitigation counseling. |
| | Comment: |

Rental Housing Assistance:

| | |
|--|--|
| | Eligibility for rental assistance or other HUD program benefits |
| | Characteristics on those receiving rental assistance (for example, race/ethnicity, # of children, age) |
| | Property inspections |
| | Other (specify): |
| | Comment: |

Grants:

| | |
|--|--|
| | Grant application scoring and selection – if any personal information on the grantee is included |
| | Disbursement of funds to grantees – if any personal information is included |
| | Other (specify): |
| | Comment: |

Fair Housing:

| | |
|--|--|
| | Housing discrimination complaints and resulting case files |
| | Other (specify): |
| | Comment: |

Internal operations:

| | |
|--|---|
| | Employee payroll or personnel records |
| | Payment for employee travel expenses |
| | Payment for services or products (to contractors) – if any personal information on the payee is included |
| | Computer security files – with personal information in the database, collected in order to grant user IDs |
| | Other (specify): |
| | Comment: |

Other lines of business (specify uses):

| | |
|--|--|
| | |
| | |
| | |

Question 5: Will you share the information with others? (e.g., another agency for a programmatic purpose or outside the government)?

Mark any that apply:

| | |
|---|--|
| | Federal agencies? |
| | State, local, or tribal governments? |
| | Public Housing Agencies (PHAs) or Section 8 property owners/agents? |
| | FHA-approved lenders? |
| X | Credit bureaus? To conduct soft hits on counseling clients' credit reports. |
| | Local and national organizations? |
| | Non-profits? |
| | Faith-based organizations? |
| | Builders/ developers? |
| | |
| X | <p>Comment: To individuals under contract to HUD or under contract to another agency with funds provide by HUD—for the preparation of studies and statistical reports directly related to the management of HUD’s Housing Counseling Programs.</p> <ul style="list-style-type: none"> A. To future researchers selected by HUD to carry out the objectives of HUD’s Housing Counseling Program in aggregate form without individual identifiers--name, address, social security number--for the performance of research and statistical activities of the Housing Counseling Programs. B. To authorized social science researchers participating in HUD’s Housing Counseling Program in aggregate form without individual identifiers--name, address, social security number--for the performance of research and statistical activities of the Housing Counseling Programs. C. To participating counseling agencies for only part of the database to gather data identifying information that they gather from their own clients participating in the study and not the part of the database that contains social security numbers, birth dates, or data on the housing counseling clients of other agencies. D. To credit bureaus to draw credit reports on the individuals selected to participate in the Housing Counseling Outcome Evaluation. E. To HUD’s Housing Counseling System, including the Client Activity Reporting System (CARS) to match sample clients’ baseline, service tracking, and outcome data gathered during the course of this research to data reported on those clients in CARS. |

Question 6: Can individuals “opt-out” by declining to provide personal information or by consenting only to particular use (e.g., allowing their financial information to be used for basic rent eligibility determination, but for not for sharing with other government agencies)?

| | |
|---|---|
| X | Yes, they can “opt-out” by declining to provide private information or by consenting only to particular use |
| | No, they can’t “opt-out” – all personal information is required |

| | |
|--|----------|
| | Comment: |
|--|----------|

If Yes, please explain the issues and circumstances of being able to opt-out (either for specific data elements or specific uses of the data):

Clients of the participating counseling agencies will not be required to participate in the study and so can opt out entirely. If clients decline to participate, it will not affect their ability to receive services from the agencies. Clients can also agree to participate in the study but decline to provide any specific information items requested. None of the information items will be mandatory to participate in the study.

Question 6: How will the privacy of the information be protected/ secured? What are the administrative and technological controls?

Mark any that apply and give details if requested:

| | |
|---|--|
| X | System users must log-in with a password |
| X | <p>When an employee leaves:</p> <ul style="list-style-type: none"> • How soon is the user ID terminated? (1 day, 1 week, 1 month, unknown)? • How do you know that the former employee no longer has access to your system? (explain your procedures or describe your plan to improve): <p>Each employee at IMPAQ has a unique identifier. There is no general company ID that can be used by multiple employees to login to the system. It is a violation of IMPAQ security policy to share usernames and logins with anyone else. When an employee leaves IMPAQ, part of the exit checklist is to disable the employee's account, so that the employee can no longer login. Remote access privileges are also disabled.</p> |
| X | <p>Are access rights selectively granted, depending on duties and need-to-know? If Yes, specify the approximate # of authorized users who have either:</p> <ul style="list-style-type: none"> • Full access rights to all data in the system: <p>Limited/restricted access rights to only selected data:</p> <p>Yes, access rights will be selectively granted, depending on duties and need-to-know. Full access rights to all data in the system will be granted to fewer than 5 users, primarily project managers at IMPAQ and Abt Associates. Limited access rights will be granted to all participating counseling agencies. Counselors will only have the ability to review records pertaining to clients of their agency.</p> |
| X | <p>Are disks, tapes, and printouts that contain personal information locked in cabinets when not in use? (explain your procedures, or describe your plan to improve):</p> <p>No, no disks or tapes are involved in the system. Backup is performed through an online vendor who backs up data on a frequent, regular basis in a manner such that the data are encrypted while in transmission over the Internet. No hard-copy printouts containing personal information are anticipated to be generated on a</p> |

| | |
|---|--|
| | regular basis. If any are generated as a result of ad hoc report requests, they will be carefully handled and shredded as soon as they are no longer needed. If these reports are needed for more than 1 day, they will be kept locked in a locked filing cabinet or in other storage rooms at IMPAQ or at off-site storage vendors which are heavily secured. |
| X | <p>If data from your system is shared with another system or data warehouse, who is responsible for protecting the privacy of data that came from your system but now resides in another? Explain the existing privacy protections, or your plans to improve:</p> <p>No, data from our system will not be shared with another system or data warehouse. Counselors will only be able to view limited data on their own agency clients online. That data will only be viewed on the counselor's computer monitor. Our system will not be designed to download data into a computer at the counselor's agency.</p> |
| X | <p>Other methods of protecting privacy (specify):</p> <p>Besides physical security of data, IMPAQ has in place procedures for handling datasets with personal identifiers that is similar to FedEx tracking system in that personal signatures by members of the IT department or the research team on the project are required at all stages of data handling until the personal identifiers are stripped and replaced with unique identifiers that are of no use to a potential identity thief. All IMPAQ staff are trained in security procedures and policies. Multiple layers of security are built into the IMPAQ computing infrastructure to maximize security.</p> |
| | Comment: |

Question 7: If privacy information is involved, by what data element(s) is it retrieved from the system?

Mark any that apply

| | |
|---|---------------------------------------|
| X | Name: |
| | Social Security Number (SSN) |
| | Identification number (specify type): |
| | Birth date |
| | Race/ ethnicity |
| | Marital status |
| | Spouse name |
| X | Home address |
| | Home telephone |
| | Personal e-mail address |
| | Other (specify): |
| | None |
| | Comment: |

Other Comments (or details on any Question above):

SECTION 3: DETERMINATION BY HUD PRIVACY ACT OFFICER

The system offers equitable risk assessment using a secure encrypted network for system access; however, it is the policies and procedures and laws that govern the protection of the data that ultimately protect individual privacy rights. The security safeguards, administrative controls, and professionalism applied by Housing Counseling Data Research user officials serves to further protect individual privacy rights. Please refer to questions 2 and 6 for a detailed description of the processes in place to ensure data protection.

This system is also classified as a Privacy Act System of Records which is expected to be published in the Federal Register September 2008. Please visit this site → <http://www.hud.gov/offices/cio/privacy/pia/fednotice.cfm> to access the official notice.