

DA PRIVACY IMPACT ASSESSMENT (PIA)

1. DA organizational name (APMS Sub Organization name):

U.S. Army Corps of Engineers (USACE)

2. Name of Information Technology (IT) System (APMS System name):

Homeowners Assistance Program Management Information System (HAPMIS)

3. Budget System Identification Number (SNAP-IT Initiative Number):

9997

4. System Identification Number(s) (IT Registry/Defense IT Portfolio Repository (DITPR):

3048

5. IT Investment (OMB Circular A11) Unique Identifier (if applicable):

N/A

6. Privacy Act System of Records Notice Identifier (if applicable):

A0405-10qCE Homeowners Assistance Case Files

7. OMB Information Collection Requirement Number (if applicable) and expiration date:

N/A

8. Type of Authority to collect information (statutory or otherwise):

DoD Directive 4165.50E, "Homeowners Assistance Program (HAP)", October 25, 2004

Section 1013 of Public Law 89-754, "Demonstration Cities and Metropolitan Development Act of 1966", as amended (80 Stat. 1255, 1290)

Executive Order (EO) 9397, *Numbering System for Federal Accounts Relating to Individual Persons*

26 U.S.C. 6109, *Identifying Numbers*

DTM 07-015-USD, *Guidance on the Use of the SSN by the Department of Defense*

Army Regulation (AR) 405-10, *Acquisition of Real Property and Interests*

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Army Regulation (AR) 405-16 dated 6/12/92, *Homeowners Assistance Program*

USACE Engineering Regulation (ER) 405-1-12, *Real Estate Handbook*

9. Provide a brief summary or overview of the IT system:

HAPMIS is the automated system that supports the Homeowners Assistance Program (HAP). HAPMIS is the system of record for HAP. HAP provides financial assistance to eligible active military and civilian employee homeowners when the real estate market is adversely affected by Base Realignment and Closure (BRAC) activities.

HAPMIS is the official source of record for the HAP program, which is directly associated with the high-profile BRAC program. It is an automated database for the following: HAP applicants; benefits applied for and received; budget plans; means of calculating settlements; and analytical tools and reports for projection and quality control.

10. Describe what information in identifiable form will be collected and the nature and source of the information:

Personally Identifiable Information (PII) includes full name, applicant Taxpayer Identification Number (TIN) (i.e., Social Security Number (SSN) or Employer Identification Number (EIN)), grade/rank, mailing address (street, city, state, zip code), employment information (unit, retirement system, branch of service), home & work telephone numbers). PII information may be collected to identify the number of affected homeowners and to determine the impact on the market, eligibility, and entitlement to specific program benefits (ref: ER 4-5-1-12, change 34, Addendum 3).

11. Describe how the information will be collected:

Information is primarily provided by the applicant via a hardcopy form (DD Form 1607, *Application for Homeowners Assistance*), which is then mailed or provided via facsimile, or in person to the appropriate HAPMIS office within USACE. The data is entered into the HAP automated information system (AIS). Additional information, some of which may consist of PII may be collected from the applicant via mail, e-mail, in-person, and interviews or other acceptable means approved by USACE. Personnel officers of other Federal agencies having custody of an applicant's personnel records will verify statements regarding employment. If personnel files are not readily available, documentation such as PCS orders, discharge orders, SF50s, or other official documents may be used to establish eligibility. Information is also collected from paper-based public records from Federal, state, and local government offices.

12. Describe the requirement, why the information in identifiable form is to be collected and how the information will be used:

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HAP provides financial relief to eligible service member and civilian employee homeowners when their homes lose value because of a base closure or realignment announcement. Application for benefits of the program is made using the DD Form 1607 which requests the applicant's PII including a TIN for data entry into HAPMIS. HAPMIS data includes HAP applicants; benefits applied for and received; budget plans; means of calculating settlements; and analytical tools and reports for projection and quality control. HAP recipients are required to pay taxes on portions of their benefits and reimbursements. The Internal Revenue Service (IRS) has the authority under 26 U.S.C. 6109 to require agencies that provide taxable benefits to collect SSNs or EINs from the corresponding taxpayers. USACE must provide the name and SSN (or EIN) to the IRS, and withhold tax payments and issue Forms W-2 and 1099 to the recipients. These actions require maintaining and reporting PII including SSNs.

13. Reserved. [N/A]

14. Describe whether the system derives or creates new data about individuals through aggregation:

The system does not create new data about individuals through aggregation. Select information, not PII related, is manually entered into the USACE Real Estate Management Information System (REMIS), thus no PII is either derived nor created through aggregation.

15. Describe with whom the information in identifiable form will be shared, both within DA and outside DA:

Data contained within a Vendor Record, to include applicant's (or designated beneficiary's) name, address, and TIN is manually entered in the Corps of Engineers Financial Management System (CEFMS). This interface supports the business processes which contribute to nationwide real estate management for the Corps. Information, to include PII disclosed by applicants will be treated on a confidential basis and will not be disclosed except to personnel in the Department of Defense who have a need for the information (ref: ER 4-5-1-12, change 34, Addendum 3). TINs will be provided to the IRS and to the Federal Reserve (in the case of a federal civilian payout) for the administration of all pertinent tax laws as all HAPMIS financial transactions made on behalf of HAP beneficiaries may incur potential tax and Federal Insurance Contributions Act (FICA) liabilities.

16. Describe any opportunities individuals will have to object to the collection of information in identifiable form about themselves or to consent to the specific uses of the information in identifiable form:

DD Form 1607 Privacy Act Statement regarding disclosure of requested information is voluntary, however, failure to furnish requested information and may result in denial of benefits provided under law. If the DD Form 1607 does not provide all of the

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information required to process an application, the applicant may be requested to provide supplemental information (ref: ER 405-1-12).

17. Describe the process regarding how the individual is to grant consent:

Acknowledgement, completion, signature and submission of DD Form 1607 to the appropriate office of the U.S. Army Corps of Engineers. Failure to furnish requested information will hinder verification of employment and homeowner information which may result either in a delay or denial of benefits.

18. Describe any information that is provided to an individual and the format of such information and means of delivery:

Financial transactions and correspondence are provided to an individual in electronic or hard copy format.

19. Describe the administrative/business, physical, and technical processes and controls adopted to secure, protect, and preserve the confidentiality of the information in identifiable form:

Computerized records are maintained in a controlled area accessible only to authorized personnel. Entry is restricted by the use of locks, guards, and administrative procedures. Access to personal information is limited to those who require the records in the performance of their official duties, and to the individuals who are the subjects of the record or their authorized representatives. Access to personal information is further restricted by the use of unique logon and passwords, which are changed periodically. This system has a current certification and accreditation. The system resides on secure Army and Federal government facilities within secured facilities.

20. Identify whether the IT system or collection of information will require a System of Records notice. If not published, state when publication of the notice will occur:

See #6.

21. Describe/evaluate any potential privacy risks the collection, use, and sharing of the information in identifiable form:

Due to the level of safeguarding, the risk to an individuals' privacy is considered to be minimal. There are no risks in providing an individual the opportunity to object or consent, or in notifying individuals. Risk is mitigated by consolidation and linkage of files and systems, derivation of data, accelerated information processing and decision making, and use of new technologies.

22. Describe/evaluate any privacy risks in providing individuals an opportunity to object/consent or in notifying individuals:

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None.

23. Describe/evaluate any risks posed by the adopted security measures:

None.

24. State classification of information/system and whether the PIA should be published or not. If not, provide rationale:

Unclassified. Publishable.

25. If a PIA is planned for publication, state whether it will be published in full or summary form:

Full

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