

**U.S. DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT**

**INITIAL PRIVACY ASSESSMENT  
(IPA)**

**Section 184**

**Office of Loan Guarantee-  
Office of Native American Programs-  
HUD**

**Instruction & Template**

**[Feb. 29, 2012]**

## **INTRODUCTION**

### **What is an Initial Privacy Assessment?**

An Initial Privacy Assessment (IPA) is designed to assess whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other related privacy documents are required. The responses to the IPA will provide a foundation for determining if either a PIA or SORN or both will be required, and will also help to identify any policy concerns.

The IPA incorporates the matters previously addressed in the Department's Personally Identifiable Information (PII) Survey, and thus replaces the survey.

### **When should an IPA be completed?**

An IPA should be completed for all information collection activities, whether the system is electronic or contains only records in paper form, and should be completed before commencement of any testing or pilot project of an information system or prior to implementing new information collections requests. Additionally, an IPA should be completed any time there is a change to the information system or collection to determine whether there are any privacy issues as a result of such a change.

### **Who should complete the IPA?**

The IPA should be written and reviewed by a combination of the component's (e.g., Privacy Act Officer, System Owner, Project Leaders, Paperwork Reduction Act Compliance Officers), and the program-specific office responsible for the system, project or information collections.

### **How is the IPA related to the Capital Planning, Certification and Accreditation, and the Paperwork Reduction Act process?**

Upon completion and approval of the IPA by the Privacy Officer the official document may be uploaded into the C&A tool, and provided as part of the IT Capital Planning, and Paperwork Reduction Act package as validation of the completed evaluation. The completed IPA demonstrates that the program components have consciously considered privacy and related requirements as part of the overall information activities. For an IT system that does not require a C&A, such as a minor application that runs on a system that does require a C&A, an IPA still should be completed to determine if other related privacy documentation are required for that system or project.

### **Where should the completed IPA be sent?**

A copy of the completed IPA should be sent to the Office of Privacy Project Leads for review. The Privacy Officer will review the IPA and determine what additional privacy documentation is required, and then will advise the Program component accordingly.

# Initial Privacy Assessment

## INFORMATION ABOUT THE SYSTEM OR PROJECT

**Date Submitted for Review:**

**Project Name/Acronym:** Section 184

**System Owner/Contact information:** Thomas C. Wright, Director  
([Thomas.C.Wright@hud.gov](mailto:Thomas.C.Wright@hud.gov) 202-402-4978)

**Project Leader/Contact Information:** Scott K. Laliberte  
([Scott.K.Laliberte@Hud.gov](mailto:Scott.K.Laliberte@Hud.gov) 202-402-3956)

**Which of the following describes the type of records in the system:**

- Paper-Only
- Combination of Paper and Electronic
- System (known as ONAP CHUMS)
- Other:** Please describe below the type of project or system, including paper based Privacy Act System of Records, Rules, or Technologies'. Also, indicate whether this is a revision/update for an existing system or project.

**Note:** For this form purpose, there is no distinction made between technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.

**Section I: The Entire IPA (Sections I and II) Should be Completed for New Systems or Projects. If this is an Existing System or Project Skip to Section II. Unless requested by the Office of Privacy, this section should not be completed for an existing System or Project.**

**Question 1: Provide a general description of the system of Project.** The following questions are intended to define the scope of the information in the system, information collection, or project, specifically the nature of the information and the sources from which it is obtained.

- a. From whom is the information collected (i.e., government employees, contractors, or consultants, state, local government entities, or general public)?

Information is gathered to record mortgage transactions from general public. We are also tracking information for government employees and approved lenders who will access the system.

- b. What is the functionality of the system, information collection, or project and the purpose that the records and/or system serve?

The system is designed to collect information related to the issuance of loan guarantees on single family mortgage loans. We also collect information from government employees and participating lenders to allow for secure login to our system and for identity verification and security controls.

- c. How is information transmitted to and from the system, information collection, or project?

Borrower information is provided in paper or electronic file submissions. Government employee and lender employee information is provided via electronic file submission. Lenders are following their own required internal security measures for encrypting of information and government employees were able to provide information solely using internal communication systems via email and server-based file sharing.

- d. What are the interconnections with other systems or projects?

At this time, the ONAP CHUMS module interfaces with FHA Connection for internet accessibility and connectivity. This system is currently only available to internal government employees at this time and the ONAP CHUMS system has not been released to lenders for access. We are hopeful that this will happen in the next 6-18 months as we continue development and integration with our contractor.

**QUESTION 2:** Have the IPA been reviewed and approved by the Chief Privacy Officer

Not at this time. This IPA is being submitted as part of a Paperwork Reduction Act submission.

(If no, please contact component privacy official for official approval)

**QUESTION 3: What is the Status of system, information collection, or project**

- a. If this is a new system, information collection, or project, specify expected production date.

This system is in development. We have released initial elements into production for internal HUD use only. We are in development and testing prior to a release to participating lenders. We do not yet have a tentative release scheduled due to contracting support issues.

- b. If an existing system, information collection, or project, specify date of production.

<<ADD ANSWER HERE>>

**QUESTION 4: Does this system, information collection, or project collect personal identifiers/sensitive information**

|                                     |                          |   |
|-------------------------------------|--------------------------|---|
| YES                                 | NO                       | <b>Does the system, information collection, or project collect personal/sensitive information?</b> (e.g. name, address, personal email address, gender/sex, race/ethnicity, income/financial data, employment history, medical history, Social Security Number, Tax Identification Number, Employee Identification Number, FHA Case Number). Includes PII that may be part of a registration process? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |   |

**If yes, specific data sets collected or provided, and the legal authorities, arrangement, and/or agreement authorize the collection of information (i.e. must include authorities that cover all information collection activities, including Social Security Numbers)?**

For the general public, the data collected is normal and customary for the completion for the processing of a mortgage application. This data includes: date of birth, SSN, address, income statements, debt statements, and credit reports for all borrowers.

For the government employees and lender employees, we are collecting the date of birth, SSN and mother's maiden name to establish login accounts as per the requirement of user requested information as mandated by FHA Connection login requirements.

**QUESTION 5: Does the information about individuals identify particular individuals (i.e., is the information linked or linkable to specific individuals, often referred to as personally identifiable information?)**

Yes

**QUESTION 6: What type of Notice(s) are provided to the individual on the scope of information collected, the opportunity to consent to uses of said information, the opportunity to decline to provide information. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.)**

- a. Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.) If notice was not published, why not?

Many of the forms in our submission were originally developed by the FHA. We have adopted and updated these forms to meet our needs as the program has evolved. I do not believe that our office has provided a notice, but these forms were approved previously for use by FHA's Single Family program. Other forms are generally accepted in the mortgage industry and may not require specific notice for our use.

- b. Do individuals have an opportunity and/or right to decline to provide information?

Many of these forms are not completed by the individual, but by

a participating lender. These lenders have already captured the information from the borrowers. We require this information be provided in order to help provide the guarantee of the loan.

- c. Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

At this time, we are not using the information for any purpose beyond tracking of the transaction.

**QUESTION 7: Is there a Certification & Accreditation record for your system? (This question does not apply to Information Collection Requests)**

**UNKNOWN**

Specify below the systems categorization. If not available identify the FISMA-reported system whose Certification and Accreditation covers this system.

**UNKNOWN**

|                 |                          |     |                          |          |                          |      |                          |           |
|-----------------|--------------------------|-----|--------------------------|----------|--------------------------|------|--------------------------|-----------|
| Confidentiality | <input type="checkbox"/> | Low | <input type="checkbox"/> | Moderate | <input type="checkbox"/> | High | <input type="checkbox"/> | Undefined |
| Integrity       | <input type="checkbox"/> | Low | <input type="checkbox"/> | Moderate | <input type="checkbox"/> | High | <input type="checkbox"/> | Undefined |
| Availability    | <input type="checkbox"/> | Low | <input type="checkbox"/> | Moderate | <input type="checkbox"/> | High | <input type="checkbox"/> | Undefined |

**SECTION II - The Entire IPA should be completed for New Systems or Projects. If this is an Existing System or Project Complete Only Complete This Section.**

**QUESTION 1: When was the system, information collection, or project developed?**

This project has been in development since March of 2009. We transitioned HUD staff to the partial release in January of 2011. The paper forms being used have been modified from previously approved forms adopted from FHA Single Family program.

**QUESTION 2: If an existing system, information collection, or project, has the system or project undergone any changes since April 17, 2003?**

This project did not exist in an electronic component prior to April, 2003. Prior to that time, the process was completed manually and the records were stored in a MS Excel data file.

**QUESTION 3: If an existing system, information collection, or project, has the system or project, explain the changes the system or project will be undergoing as part of this renewal/update process.**

This project will eventually lead to the retirement of some of the paper forms in our request as they will be captured electronically via the CHUMS system.

**QUESTION 4: Do the changes to the system, information collection, or project involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?**

No.

**QUESTION 5: Please indicate if any of the following changes to the system or project have occurred: (Mark all boxes that apply.)**

- A conversion from paper-based records to an electronic system.
- A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.
- A new use of an IT system, including application of a new technology that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and /or avenue for exposure of data that previously did not exist.)
- A change that results in information in identifiable form being merged, centralized, or matched with other databases.



- A new method of authenticating the use of an access to information in the identifiable form by members of the public.
- A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
- A new interagency use of shared agency function that results in new uses or exchanges of information in identifiable form.
- A change that results in a new use of disclosure of information in identifiable form.
- A change that results in new items of information in identifiable form being added into the system.

**QUESTION 6: Does a PIA for the system or project already exist? If yes, please provide a copy of the notice as an appendix.**

No.

## PRIVACY OFFICE DETERMINATION

(To be completed by the Privacy Office)

|                                     |   |
|-------------------------------------|---|
| <input type="checkbox"/>            | <b>This is <u>NOT</u> a privacy sensitive system, information collection or project – the system, information collection, or project contains no personal identifiers/sensitive information</b> |
| <input checked="" type="checkbox"/> | <b>This <u>IS</u> a Privacy Sensitive Project</b>   |
| <input type="checkbox"/>            | <b>IPA sufficient at this time</b>  |
| <input checked="" type="checkbox"/> | <b>A PIA is required</b>  |
| <input type="checkbox"/>            | <b>The existing PIA requires an update/deletion</b>   |
| <input type="checkbox"/>            | <b>A SORN is required</b>   |
| <input type="checkbox"/>            | <b>The existing SORN requires an update or should be deleted</b>  |
| <input type="checkbox"/>            | <b>Other</b>  |
| <b>COMMENTS:</b>                    |   |

# DOCUMENT ENDORSMENT

|   |
|---|
| DATE REVIEWED: 9.6.12                           |
| PRIVACY REVIEWING OFFICIALS NAME: ANGELO BROOKS |

By Signing below you attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.

\_\_\_\_\_  
**SYSTEM OR PROJECT OWNER**  
 << INSERT NAME/TITLE >>  
 << INSERT PROGRAM OFFICE >>

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**PROGRAM AREA MANAGER**  
 << INSERT NAME/TITLE >>  
 << INSERT PROGRAM OFFICE >>

\_\_\_\_\_  
**Date**

*Janis E. Noble*  
 for *Donna Robinson-Stein*

*9-6-12*  
**Date**

**CHIEF PRIVACY OFFICER,**  
 << INSERT NAME >>  
 Office of the Chief Information Officer  
 U. S. Department of Housing and Urban Development