U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

INITIAL PRIVACY ASSESSMENT (IPA)

Debts Owed to Public Housing Agencies and Terminations:
OMB Control Number: 2577-0266

Office of Public and Housing
Real Estate Assessment Center

Instruction & Template

[DATE]

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: Debts owed to Public Housing Agencies & Terminations

System Owner/Contact information:

Project Leader/Contact Information:

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

☐   Paper-Only

☐   Combination of Paper and Electronic

☐   System

☐   **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.

This is an existing information collection.

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)?

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

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

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

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

(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.

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

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

YES   NO   **Does the system, information collection, or project collect personal/sensitive information?** (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?

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)?

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?)

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?

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

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?

QUESTION 7: Is there a Certification & Accreditation record for your system?

(This question does not apply to Information Collection Requests)

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

Confidentiality	☐	**Low**	☐	**Moderate**	☐	**High**	☐	**Undefined**
Integrity	☐	**Low**	☐	**Moderate**	☐	**High**	☐	**Undefined**
Availability	☐	**Low**	☐	**Moderate**	☐	**High**	☐	**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 is the first IPA completed for this ICR. The Debts Owed to Public Housing Agencies and Terminations process is implemented through a module within the Enterprise Income Verification (EIV) system. The EIV system was deployed on October 28, 2002. The system has a Privacy Impact Assessment that was last updated, June 2011, and a Privacy Act System of Records Notice last updated, September 2009.

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

Yes, the system has undergone updates since April 17, 2003. Please refer to the PIA publication at this link: http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_15047.pdf

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.

Yes, the ICR does involve an update; however, this update does not impact privacy. The information collection will include an update of the number of burden hours as part of the current renewal.

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 IPA for the system or project already exist? If yes, please provide a copy of the notice as an appendix.

No. This is the first IPA completed for the EIV Debts Owed to PHAs and Terminations module, as stated in response to question 1 above. A Privacy Act System of Records and Privacy Impact Assessment have already been established for the system.

PRIVACY OFFICE DETERMINATION

(To be completed by the Privacy Office)

☐	**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**
☐	**This <u>IS</u> a Privacy Sensitive Project**
☐	**IPA sufficient at this time**
☐	**A PIA is required**
☐	**The existing PIA requires an update/deletion**
☐	**A SORN is required**
☐	**The existing SORN requires an update or should be deleted**
☐	**Other**

COMMENTS:

This is a sensitive project that collects PII information; however, the IPA is sufficiently supports the renewal of the ICR which does not pose any privacy risk. The existing ICR requires an update to include the proper citation supporting the collection of SSNs by EIV.

DOCUMENT ENDORSMENT

DATE REVIEWED: 4/2/2013
PRIVACY REVIEWING OFFICIALS NAME: Angela 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.

_____   _____
                                                                                        Date

SYSTEM OR PROJECT OWNER

<< INSERT NAME/TITLE>>

<<INSERT PROGRAM OFFICE>>

_____   _____
                                                                                        Date

PROGRAM AREA MANAGER

<<INSERT NAME/TITLE>>

<<INSERT PROGRAM OFFICE>>

_____   _____
                                                                                        Date

CHIEF PRIVACY OFFICER,

<<INSERT NAME>>

Office of the Chief Information Officer
U. S. Department of Housing and Urban Development