

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

**INITIAL PRIVACY ASSESSMENT  
(IPA)**

**[Section 901 Implementation  
2577-0245]**

**[PIH Office of Policy, Program, and  
Legislative Initiatives]**

**Instruction & Template**

**[April 26, 2013]**

## **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:** 4/26/13

**Project Name/Acronym:** Section 901 Implementation (Funding Flexibility for PHAs Impacted by Hurricanes Katrina and Rita)

**System Owner/Contact information:** Not applicable. This collection does not involve any automated system for collecting information.

**Project Leader/Contact Information:** Sherry Fobear McCown, PIH Office of Policy, Program, and Legislative Initiatives, 490 E. L'Enfant Plaza, Suite 2206, Washington, DC 20024 (202-402-7651)

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

- Paper-Only
- Combination of Paper and Electronic (*email transmissions, .pdf/MSWord files*)
- 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.**

**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)?

The information is collected from Public Housing Agencies (PHAs) that were most impacted by Hurricanes Katrina and Rita. This collection affects only ten (10) PHAs.

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

PHAs submit their plans for using Housing Choice Voucher (HCV) and public housing capital and operating funds interchangeably to benefit families that were receiving HUD assistance before the hurricanes and were displaced from their housing by the hurricanes. The funding flexibility is available for a period of up to 5 years. PHAs implement their plans and submit programmatic progress reports and reports of expenditures to Headquarters and their local field office.

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

PHAs complete Microsoft Word documents that include information on fungibility plans, amount of funds obligated and spent, and narrative descriptions of progress made in carrying out Section 901 plans. PHAs transmit these files to HUD personnel through email transmissions.

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

PHAs may use unspent HCV funds for public housing Capital Fund purposes, including mixed-finance, to develop new housing for displaced families. PHAs must follow the rules of the program for which funds are being used. HUD issued instructions in 2006 for using the REAC Financial Data Schedule (FDS) to account for the funds. Housing development projects must undergo environmental and subsidy layering reviews, and any other reviews normally required of such activities.

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

This is the first IPA for this collection.

(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 is an extension of an existing collection.

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

This collection initially took effect in 2006.

**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? (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?</b> |
| <input type="checkbox"/> | <input checked="" 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)?**

**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?)**

No personal or personally identifiable information is requested.

**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?

See FR notice of proposed information collection published on 2/25/2013.

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

The information is needed for HUD to effectively monitor progress of Section 901 fungibility plans, but HUD would entertain requests from PHA organizations (not individuals) declining to submit the subject information if justified.

- 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?

This collection does not apply to individuals.

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

Not applicable.

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

<<ADD ANSWER HERE>>

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?**

2006.

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

The collection was changed from its initial launch in 2006 to require PHAs to submit reports of funds obligations and expenditures and narrative progress reports from once a year to once every quarter. This change was necessary to permit HUD to have better and more frequent reporting of how well PHAs were spending their funds for Section 901 activities and progress PHAs were making in completing those activities.

**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.**

Templates for submitting Section 901 plans to HUD, and reporting programmatic and financial status were expanded in 2008 and described in the most recent PRA extension.

**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?**

The changes are at the agency level to better inform HUD of progress they are making in expending funds for approved re-development or other activities to benefit families that were receiving HUD housing assistance when Hurricanes Katrina and Rita occurred in 2005, that were displaced from their housing as a result of the hurricanes. This Section 901 initiative ends in December 2014.

**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

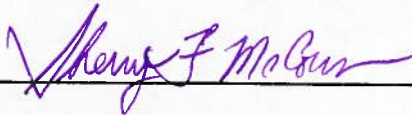
(To be completed by the Privacy Office)

<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 type="checkbox"/>	<b>This <u>IS</u> a Privacy Sensitive Project</b>
<input type="checkbox"/>	<b>IPA sufficient at this time</b>
<input 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:
PRIVACY REVIEWING OFFICIALS NAME:

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.

  
\_\_\_\_\_

7/19/13  
Date

**Sherry Fobear McCown**

**Program Analyst**

**PIH Office of Policy, Program, and Legislative Initiatives**

  
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7/20/13  
Date

**Merrie Nichols Dixon**

**Deputy Director**

**PIH Office Of Policy, Program, and Legislative Initiatives**

\_\_\_\_\_

\_\_\_\_\_  
Date

**CHIEF PRIVACY OFFICER,**

**<<INSERT NAME>>**

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

THE UNIVERSITY OF CHICAGO

TO THE PRESIDENT OF THE UNIVERSITY OF CHICAGO  
FROM THE FACULTY OF THE DIVISION OF THE PHYSICAL SCIENCES  
RESOLUTION OF THE FACULTY OF THE DIVISION OF THE PHYSICAL SCIENCES  
APPROVED BY THE FACULTY OF THE DIVISION OF THE PHYSICAL SCIENCES  
ON APRIL 15, 1964

1964

James M. Van Dyke

James M. Van Dyke

1964

James M. Van Dyke

James M. Van Dyke

James M. Van Dyke