U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

INITIAL PRIVACY ASSESSMENT (IPA)

Delta Community Capital Initiative (DCCI)

Office of Rural Housing and Economic Development

December 18, 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: December 18, 2013

Project Name/Acronym: Delta Community Capital Initiative (DCCI)

System Owner/Contact information: Jackie L. Williams, Director, Office of Rural Housing and Economic Development

Project Leader/Contact Information:

Thann Young, Office of Rural Housing and Economic Development, 877-787-2526 or (202) 708-2290.

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.

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Question 1: Provide a general description of the system or Project.

The Delta Community Capital Initiative is a collaborative effort among three federal agencies - the Department of Housing and Urban Development (HUD), the Department of the Treasury - Community Development Financial Institutions Fund (CDFI Fund) and the Department of Agriculture - Rural Development (USDA-RD). The purpose of the Delta Community Capital Initiative (DCCI) is to support local rural nonprofits and Federally Recognized Indian tribes serving the Lower Mississippi Delta for lending and investing activities in businesses lending and economic development, and for securing additional sources of public and private capital for these activities. Funding for the DCCI is provided by recaptured funds from the Rural Housing and Economic Development grant, which was authorized by The Department of Veterans Affairs and the Department of Housing and Urban Development and Independent Agencies Appropriations Act, 1998 (Public Law 105-276, October 27, 1997).

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 collected from non-profit organizations and federally recognized Indian Tribes based on a Notice of Funding Availability (NOFA).

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

Information collection is based on the grant agreement reporting requirements. These documents include semi-annual reports and close-out certifications.

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

There is no automated or electronic system for this Initiative. Information will be collected from semi-annual reports and close-out certifications.

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

Funds for this Initiative will be recaptured from Rural Housing and Economic Development grants.

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Question 2: What is the Status of system, information, collection or project?

This is a new Initiative.   Information collection will be administered based on the grant agreements.   Project information will be collected manually.

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

   The Notice of Funding Availability publication for this new Initiative is projected to occur in 2014.

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

   The Notice of Funding Availability publication for this project is projected to occur in 2014. This project is a new Initiative. Information collection will be administered based on the grant agreements.

QUESTION 3: 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 4: 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?)

Eligible applicants for this Initiative are non-profit organizations and federally recognized Indian tribes. However, all HUD competitive programs are governed by the General Section in accordance with the HUD Reform Act of 1989. As a result, applicants are required to submit the SF-LLL (Disclosure of Lobby Activities form) and the HUD- 27601 (Race and Ethnic Data Reporting form) as a part of the application. As a note, the Office of Rural Housing and Economic Development is not responsible for analyzing or utilizing the data collected as a function of the Office.

In addition, applicants are required to submit an SF-424 form, which includes the organization's point of contacts.

QUESTION 5: 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.) If notice was not published, why not?

  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?

  Data collection for the Initiative does not include Personal Identifiable Information (PII). The SF-LLL (Disclosure of Lobby Activities) and the HUD 27601 (Race and Ethnic Data Reporting form) are a part of the General Section Notice of Funding Availability requirements in accordance with the HUD Reform Act of 1989.

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

  Data collection for the Initiative does not include Personal Identifiable Information (PII). The SF-LLL(Disclosure of Lobby Activities form) and the HUD 27601 (Race and Ethnic Data Reporting form) are a part of the

General Section of the Notice of Funding Availability requirements in accordance with the HUD Reform Act of 1989.

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?

Data collection for the Initiative does not include Personal Identifiable information (PII). The SF-LLL (Disclosure of Lobby Activities form) and the HUD 27601 (Race and Ethnic Data Reporting form) are a part of the General Section of the Notice of Funding Availability requirements in accordance with the HUD Reform Act of 1989.

QUESTION 6: Is there a Certification & Accreditation record for your system? **(This question does not apply to Information Collection Requests)**

There is no electronic system for the Initiative. Therefore, there are no certification and accreditation records.

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

Information collection is based on reporting terms of the grant agreement.

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 a new Initiative. Information collection will be administered based on the grant agreements.   Project information will be collected manually.

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

This is a new Initiative. Information collection will be administered based on the grant agreements.   Project information will be collected manually.

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 is a new Initiative. Information collection will be administered based on the grant agreements project.   Project information will be collected manually.

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?

 This is a new Initiative. Information collection will be administered based on the grant agreements.   Project information will be collected manually.

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

No automated or electronic system will be used to collect project information.   All project data will be collected manually in hard copy.

☐ 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.

An PIA does not exist for this Initiative.

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:	

DOCUMENT ENDORSMENT

| DATE REVIEWED: |
| PRIVACY REVIEWING OFFICIALS NAME: |

The IPA is "not" an official document until all signatures are obtained for this page.

By signing below the Program Office or Support Office 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