

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

**INITIAL PRIVACY ASSESSMENT  
(IPA)**

**Closeout Instructions for Community  
Development Block Grant (CDBG)  
Programs Grants**

**[Community Planning and Development]**

## **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 both a PIA and a SORN should either or both be required, and will also help to identify any policy concerns.

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

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

An IPA should be completed during the system's design phase, 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. Additionally, an IPA should be completed any time there is a change to the information system 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), and the program-specific office responsible for the system.

### **How is the IPA related to the Capital Planning and Certification and Accreditation 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 process 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 system design. 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 via email to [Donna.Robinson.Staton@HUD.gov](mailto:Donna.Robinson.Staton@HUD.gov) and [Nadine.Craft@HUD.gov](mailto:Nadine.Craft@HUD.gov). 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

## I. INFORMATION ABOUT THE PROJECT/SYSTEM

**Date submitted for review:** March 12, 2014

**Project Name/Acronym:** Closeout Instructions for Community Development Block Grant (CDBG) Programs Grants

**System Owner/Contact Information:** Jessie Handforth Kome, 202-402-5539

**Project Leader/Contact Information:** James Stansell, 202-402-2158

**CPD ISSO/Contact Information:** Sam Walker, 202-402-3883

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

- Paper-Only
- Combination of Paper and Electronic
- Electronic-Only
- Other:** Please describe the type of project including paper based Privacy Act System of Records

\* **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.

**2. Provide a general description of the system or project that describes:** (a) the functionality of the system and the purpose that the records and/or system serve; (b) who has access to information in the system; (c) how information in the system is retrieved by the user; (d) how information is transmitted to and from the system; and (e) interconnections with other systems.

The Closeout Instructions for Community Development Block Grant (CDBG) Programs Grants will be using the Disaster Recovery and Reporting System (DRGR), to provide information to the HUD field offices. DRGR is a web-based system used to electronically administer several HUD grant programs including Community Development Block Grant – Disaster Recovery (CDBG-DR, OneCPD Technical Assistance (OneCPD-TA), Neighborhood Stabilization Program Technical Assistance (NSP-TA), Rural Innovation Fund (RIF) and the Neighborhood Stabilization Programs (NSP1, NSP2 and NSP3). Grantees use DRGR to specify disaster impact, identify needs, develop action plans, propose activities, draw grant funds (via LOCCS interface), and report on accomplishments. HUD uses DRGR to track immediate and long-term grantee progress, approve draws, monitor funds, and ensure compliance with requirements specific to each grant. Information is transmitted to the

DRGR system using the internet via a browser on the user's PC or laptop. The DRGR system interfaces with the Line of Credit Control System (LOCCS).

**3. Have the IPA been reviewed and approved by the Departmental Privacy Officer**

- YES
- NO (Please contact component privacy official before submitting official IPA.)

**4. Status of System or Project**

- This is a new system or project in development

Specify expected production date: **Do not complete Section II.**

- This is an existing system or project.

**After completing Section I, complete Section II.**

**5. System or project personal identifiers/sensitive information**

- |                                     |                          |  |
|-------------------------------------|--------------------------|--|
| YES                                 | NO                       | <b>Does the system or project collect, maintain use or disseminate other personal identifiers/ sensitive information</b> (i.e., name, home address, home telephone number, date of birth, gender status, income/financial data, employment, medical history, criminal record, etc.)? |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> |  |

If yes, briefly describe the types of information about individuals in the system.

Some grant program policies for programs such as NSP require that state/local and other organizations receiving grants enter addresses for single-family properties that receive funds for construction and repair, and homeownership assistance, but these records do not include the name or other personal identifying information of any persons residing at these properties.

To create new user accounts for grantees or HUD staff, we ask for their name and office address, phone # and email address.

**6. 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
- NO (If no, indicate below **how the information** is not identifiable to specific individuals.)

**7. Does the personally identifiable information in the system pertain only to government employees, contractors, or consultants?**

YES (If yes, specify individual type.) \_\_\_\_\_

NO (If no, indicate below how the information is not identifiable to specific individuals.)

**8. Is there an existing Privacy Act System of Records Notice (SORN) that has been published in the Federal Register to cover the system? (Please consult with the component's Privacy Act Officer if assistance is needed in responding to this question.)**

YES

NO

**9. SSN usage**

YES NO Do the project or system collect, maintain, use, or disseminate Social Security Numbers (SSNs)? (This includes truncated SSNs)

If yes, please provide the **purpose/legal authority** authorizing the solicitation of SSNs:

**10. Is there a Certification & Accreditation record for your system?**

YES (If yes, indicate the following :)

Confidentiality  Low  Moderate  High  Undefined

Integrity  Low  Moderate  High  Undefined

Availability  Low  Moderate  High  Undefined

NO (If no, please identify the FISMA-reported system whose C&A covers this system.)

DO NOT KNOW

**II. EXISTING SYSTEM OR PROJECT**

**1. When was the system developed?** The DRGR system was developed in 1992 for HUD grantees following Hurricane Andrew to submit plans on projected use of funds and to provide subsequent progress/performance reports.

**2. If an existing system, has the system undergone any changes since April 17, 2003?**

YES (If yes, explain the nature of those changes and proceed to Question 3.)

Significant changes to the DRGR system have been implemented. Below is a table summarizing all releases with major functionality changes since 2003:

|  | <b>Release #</b> | <b>Release Date</b> | <b>Business Benefits</b>   |
|--|------------------|---------------------|--|
| <b>LOCCS Integration</b>   | Release 6.3      | 9-Jan               | Integration of DRGR with LOCCS for purposes of drawing down grants. Users track grant and program income disbursements to other organization at the activity level through a drawdown module instead of self-reporting and making draws at the grant/program level. This removes the need for reconciliation between systems.  |
| <b>Microstrategy / Single Sign on</b>  |                  |                     |  |
| <b>Grantee Oversight Activities: Monitoring, Audit, Technical Assistance</b>     | Release 6.5      | 10-Apr              | Permits remote review of grantee oversight activities used to prevent fraud, waste, and abuse. Grantees enter data on compliance reviews made of other organizations funded under CPD grant programs in DRGR and organizations that receive technical assistance from the grantees. HUD staff can review the data remotely to assess risk and identify need for HUD monitoring and technical assistance. |
| <b>Beneficiary Data: Census Data Lookup Tables and Race/Ethnicity Data Entry</b> |                  |                     |  |
| <b>User Certification Screens</b>  |                  |                     |  |
|  | Release 7.3      |                     |  |
| <b>Customization of Screens for Technical Assistance (TA) Programs</b>           |                  |                     |  |

NO (If no, proceed to question 5.)

**3. Do the changes to the system 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?****

YES

NO

**4. 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.

**5. Does a PIA for the system already exist?**

YES (If yes, provide the date and title of the PIA and whether the PIA is posted on the Privacy Office webpage). The existing DRGR PIA was done in May 2005 and yes it is posted on the Privacy Office webpage.

NO.

# IPA Determination/Approval

(To be completed by the Privacy Office)

|                 |
|-----------------|
| DATE REVIEWED:  |
| REVIEWERS NAME: |

|                          |  |
|--------------------------|--|
| <input type="checkbox"/> | <b>This is <u>NOT</u> a Privacy Sensitive Project - the project contains no personal identifiers/sensitive information</b> |
| <input type="checkbox"/> | <b>This <u>IS</u> a Privacy Sensitive Project</b>  |
| <input type="checkbox"/> | PTA sufficient at this time  |
| <input type="checkbox"/> | A PIA is required  |
| <b>COMMENTS:</b>         |  |

\_\_\_\_\_  
Program Director Signature  
[Title]

\_\_\_\_\_  
Date

\_\_\_\_\_  
Departmental Privacy Officer Signature

\_\_\_\_\_  
Date