

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

**INITIAL PRIVACY ASSESSMENT
(IPA)**

**24 CFR Part 50 – Protection and
Enhancement of Environmental
Quality**

Office of Environment and Energy

Instruction & Template

September 2014

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: September 29, 2014

Project Name/Acronym: 24 CFR Part 50 – Protection and Enhancement of Environmental Quality

System Owner/Contact information: Danielle Schopp,
danielle.l.schopp@hud.gov, 202.402.4442

Project Leader/Contact Information: Danielle Schopp,
danielle.l.schopp@hud.gov, 202.402.4442

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.

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)?

Businesses, not-for-profit organizations, and local governments receiving HUD funds.

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

HUD requests its applicants to supply environmental information that is not otherwise available to HUD staff for the environmental review on an applicant's proposal for HUD financial assistance to develop or improve housing or community facilities. HUD itself must perform an environmental review for the purpose of compliance with its environmental regulations found at 24 CFR Part 50, Protection and Enhancement of Environmental Quality. Part 50 implements the National Environmental Policy Act and implementing procedures of the Council on Environmental Quality, as well as the related federal environmental laws and executive orders. HUD's agency-wide provisions -- 24 CFR 50.3(h)(1) and 50.32 --regulate how individual HUD program staffs are to utilize such collected data when HUD itself prepares the environmental review and compliance. Separately, individual HUD programs each have their own regulations and guidance implementing environmental and related collection responsibilities.

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

Respondents are encouraged to use electronic technology available to the general public. To the extent practicable, the information is submitted by e-mail and/or FAX, by phone, through the HUD Environmental Review Online System (HEROS) or other means decided by the applicant. HUD does not keep statistics, but currently most applicants generally prefer to submit environmental data by e-mail and/or FAX. We assume, but have no statistics, that some (10% or less is a guess) would continue to prefer, because it is easier and best meets particular conditions, to make submission by postal mail, by UPS or Fedex, or by delivery in person.

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

None.

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

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

N/A

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

HUD has been collecting this information since the 1970's.

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)?

N/A

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?)

There is no personally identifiable information beyond name and work contact information so that respondents can be contacted by HUD staff as necessary.

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.)

- 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?

No, Environmental reviews must be completed to receive federal funding.

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

No.

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?

No.

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

No.

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

N/A

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?

HUD has been collecting this information for approximately 40 years, as required by the National Environmental Policy Act of 1969.

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

Not significantly. Although the options for means of transmitting information may have expanded as technology as evolved, the information being collected has not changed.

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.

With the implementation of the HUD Environmental Review Online System (HEROS), respondents may soon begin submitting their submissions using that system (in addition the ways already in use, including email and mail). Otherwise, no changes have been made. Respondents may elect to continue submitting their information by paper.

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.

None found.

PRIVACY OFFICE DETERMINATION

(To be completed by the Privacy Office)

<input type="checkbox"/>	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
<input type="checkbox"/>	This <u>IS</u> a Privacy Sensitive Project
<input type="checkbox"/>	IPA sufficient at this time
<input type="checkbox"/>	A PIA is required
<input type="checkbox"/>	The existing PIA requires an update/deletion
<input type="checkbox"/>	A SORN is required
<input type="checkbox"/>	The existing SORN requires an update or should be deleted
<input type="checkbox"/>	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.

SYSTEM OR PROJECT OWNER	Date
<< INSERT NAME/TITLE >>	
<<INSERT PROGRAM OFFICE>>	

PROGRAM AREA MANAGER	Date
<<INSERT NAME/TITLE>>	
<<INSERT PROGRAM OFFICE>>	

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

