U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

Initial Privacy Assessment

CoC Homeless Assistance Grants Application

Office of Special Needs Assistance Programs

Template July 2015

October 20, 2015

INITIAL PRIVACY ASSESSMENT (IPA)

The Initial Privacy Assessment (IPA) is use to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002. The IPA is also used to determine if a System of Records Notice (SORN) is required under the Privacy Act of 1974.

The IPA is an administrative form created by the Privacy Branch to efficiently and effectively identify the use of Personally Identifiable Information (PII) across the Department. The IPA focuses on three areas of inquiry:

- Business data and business processes within each HUD program.
- Potential connections with individuals including the use of PII – any use of social security numbers must be specifically identified.

HUD's program and support offices should ensure that its respective IPA is completed and sent to the Privacy Branch for approval. If SSNs are to be used, the IPA specifically identifies the justification and authority for using SSNs. Upon receipt of the IPA, the Privacy Branch determines the applicability of other privacy compliance requirements including the PIA and SORN. The IPA is complete when the Privacy Branch signs it and sends the final copy back to the identified point of contact.

Please complete this form and send it to the HUD Privacy Branch staff.

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Janice Noble
Acting, Branch Chief
Privacy Branch
U.S. Department of Housing and Urban Development

Privacy@hud.gov

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If a PIA or SORN is required, a copy of the Privacy Impact Assessment and System of Records Notice form is available on the HUD Privacy Branch website, http://hudatwork.hud.gov/HUD/cio/po/i/privacy, on HUD@Work or directly from the HUD Privacy Branch via email: privacy@hud.gov to complete and return.

INITIAL PRIVACY ASSESSMENT (IPA) SUMMARY INFORMATION

Date Submitted for Review: August 20, 2015

Name of System or Project: Continuum of Care Homelessness Assistance Grants

System Name in CSAM: *e-snaps*

Name of Program Office: Office of Special Needs Assistance Programs

Name of Project Manager or System Owner: Tonya Proctor

Email for Project Manager or System Owner: Tonya.Proctor@hud.gov

Phone Number for Project Manager or System Owner: 202-402- 5697

Type of Project:

☐ Information Technology and/or System

☐ A Notice of Proposed Rule Making or a Final Rule:

☒ Form or other Information Collection: Applicants (state and local governments, public housing authorities, private non-profit organizations) submit applications electronically via e-snaps.hud.gov. Applications consist of multiple choice, numeric fields and narrative responses, as well as electronic attachments. This is part of a reauthorization package for the annual application process necessary for the operation of HUD's Continuum of Care Program (24 CFR part 578).

☐ Other:

SPECIFIC QUESTIONS

1. **Describe the project and its purpose:**

The regulatory authority to collect this information is contained in 24 CFR Part 578, and is authorized by the McKinney-Vento Act, as amended by S. 896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (42 U.S.C. 11371 et seq.) which states that "The Secretary shall award grants, on a competitive basis, and using the selection criteria described in section 427, to carry out eligible activities under this subtitle for projects that meet the program requirements under section 426, either by directly awarding funds to project sponsors or by awarding funds to unified funding agencies."(SEC.422(a))

The CoC Homeless Assistance Grant Application (OMB 2506-0112), also called the CoC Consolidated Application, includes a CoC Application and Project Listing that collect information from the statewide and local CoCs, and a Project Application that collects information from the individual project recipients within those CoCs. The CoC Consolidated Grant Application is necessary for the selection of proposals submitted to HUD (by State and local governments, public housing authorities, and nonprofit organization) for the grant funds available through the CoC Program.

The purpose of this information collection is to determine each CoC's progress toward: 1) promoting community-wide commitment to the goal of ending homelessness, including homelessness among the specific subpopulations of the chronically homeless, families, youth and Veterans; 2) provide funding for efforts by nonprofit providers and State and local governments to quickly re-house homeless individuals and families into permanent housing while minimizing the trauma and dislocation caused to individuals, families, and communities by homelessness; and 3) promote access to, and effective utilization of mainstream programs and programs funded with State or local resources in order to increase self-sufficiency among individuals and families experiencing homelessness. The information also allows HUD to assess project quality according to the threshold criteria established annually by the CoC Program Competition Notice of Funding Availability (NOFA) and according to 24 CFR part 578.

2. **Status of Project:**

☐ This is a new development effort.

☒ This is an existing project.

Date first developed: First use of *e-snaps* was during in FY 2008

Date last updated: FY 2015

3. **From whom do you collect, process, or retain information on: (Please check all that apply)**

☐ HUD Employees

☐ Contractors working on behalf of HUD

☒ The Public (Only organizations and never individuals)

☐ The System does not contain any such information.

4. **Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)**

    ☒ No.

    ☐ Yes. Why does the program collect SSNs? Provide the function of the

      SSN and the legal authority to do so:

HUD will not collect SSNs. Please note that the HUD2880, which is a required form for the application, asks for the applicant's "SSN or EIN." Since all applicants are organizations – and never individuals – the field will only be used for EIN numbers and no SSNs will be submitted.

5. **What information about individuals could be collected, generated or retained?**

The Continuum of Care Homelessness Assistance Grant Applications are not designed to capture information about individuals. Information is only collected about state and local government agencies, public housing authorities, and private non-profit organizations. Information about the projects that the organizations are applying to fund is never collected on an individual level and is only ever collected in aggregate.

The HUD and government-wide standard forms included with the application do not collect information about individuals and only collect information at the organization or aggregate level. These forms include the HUD2880, HUD50070, SFLLL, HUD96011, SF424, and SF424 (SUPP)

6. **If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?**

    ☒ No. Please continue to the next question.

    ☐ Yes. Is there a log kept of communication traffic?

        ☐No. Please continue to the next question.

        ☐ Yes. What type of data is recorded in the log? (Please choose all that apply.)

            ☐ Header

☐ Payload Please describe the data that is logged.

7. **Does the system connect, receive, or share Personally Identifiable Information with any other HUD systems?**

☒ No.

☐ Yes. Please list the systems:

Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)? Not applicable.

8. **Does the system meet all of the following requirements?**

There will be a group of records under the control of an agency that contains a personal identifier (such as a name, date of birth, SSN, Employee Number, fingerprint, etc.) of U.S. citizens and lawful permanent residents;

Contains at least one other item of personal data (such as home address, performance rating, blood type, etc.); and

The data about the subject individual IS retrieved by the name or unique identifier assigned to the individual.

☒ No.
☐ Yes.

If yes is there an existing System of Record Notice?

☐ No.
☐ Yes.

9. **Is there an Authorization to Operate record within OCIO's FISMA tracking system CSAM?**

☐ Unknown

☒ No

☐ Yes. Please indicate the determinations for each of the following:

Confidentiality: ☐ Low ☐ Moderate ☐ High

Integrity: ☐ Low ☐ Moderate ☐ High

Availability: ☐ Low ☐ Moderate ☐ High

PRIVACY DETERMINATION
(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

Date reviewed by the HUD Privacy Branch: <Insert Date.>

Name of the HUD Privacy Branch Reviewer: <Please enter name of reviewer.>

DESIGNATION

☐ **This is NOT a Privacy Sensitive System** – the system contains no Personally Identifiable   Information.

☐ **This IS a Privacy Sensitive System**
Category of System

☐ IT System

☐ Legacy System

☐ HR System

☐ Rule

☐ Other: _____

Determination

☐ IPA sufficient at this time

☐ Privacy compliance documentation determination in progress

☐ PIA is not required at this time

☐ PIA is required

☐ System covered by existing PIA:

☐ New PIA is required

☐ PIA update is required

☐ SORN not required at this time

☐ SORN is required

☐ System covered by existing SORN:

☐ New SORN is required

HUD PRIVACY BRANCH COMMENTS:

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.

_____   _____
Date

SYSTEM OWNER

<< INSERT NAME/TITLE>>
<<INSERT PROGRAM OFFICE>>

_____   _____
Date

CHIEF PRIVACY OFFICER

<<INSERT NAME/TITLE>>
OFFICE OF ADMINISTRATION