

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

**INITIAL PRIVACY ASSESSMENT**

**Housing Choice Voucher Program**

**Voucher Management and Operations  
Division**

**Instruction & Template**

**October 12, 2011**

## **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 Privacy 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), 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

## SECTION I: INFORMATION ABOUT THE SYSTEM OR PROJECT

Date Submitted for Review: *October 12, 2001*

Project Name/Acronym: *Housing Choice Voucher (HCV) Program*

System Owner/Contact information: *NA*

Project Leader/Contact Information: *Phyllis Smelkinson, Housing Program Specialist, 202-402-4138*

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

- Paper-Only
- Combination of Paper and Electronic
- System/Project
- Other:** Please describe the type of project is the system or program, including paper based Privacy Act System of Records, Rules, or Technologies'.

**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.

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

*Since the PRA for the HCV program is not a new system or collection, answers will begin with Question 2.*

- a. From whom is the information collected (i.e., government employees, contractors, or consultants, state, local government entities, or general public)?
- b. What is the functionality of the system, information collection, or project and the purpose that the records and/or system serve?
- c. How is information transmitted to and from the system, information collection, or project?
- d. What are the interconnections with other systems or projects?

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

*Not prior to the submission of the current PRA.*

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

*The HCV program and the previous Section 8 Certificate program have been in existence since 1975.*

**QUESTION 4:** Does this system, information collection, or project collect personal identifiers/sensitive information.

*There are no forms or documents that are stored as part of this collection. Information stored in the Management Information System (MIS) subset Public and Indian Housing Information Center (PIC) is covered under a different PRA (OMB Unique Identifier: 02500010601000000301093). The form HUD-50058 (Family Report) and HUD-50058 MTW (for the Moving to Work program) that*

*captures personal identifiers and sensitive information is also covered under a different PRA (2577-0083).*

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)?**

*The HCV program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the family or individual, participants are able to find their own housing, including single-family homes, townhouses and apartments. The participant is free to choose any housing that meets the requirements of the program and is not limited to units located in subsidized housing projects.*

*HCVs are administered locally by public housing agencies (PHAs). The PHAs receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the voucher program. A family that is issued a HCV is responsible for finding a suitable housing unit of the family's choice where the owner agrees to rent under the program. This unit may include the family's present residence. Rental units must meet minimum standards of health and safety as determined by the PHA. A housing subsidy is paid to the landlord directly by the PHA on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program.*

*Under certain circumstances, if authorized by the PHA, a family may use its voucher to purchase a modest home. Section 8(o) of the United States Housing Act of 1937 (USHA), as amended by Section 545 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA) authorized the merger of the Section 8 tenant-based programs (certificate and voucher programs) into a single market-driven program (entitled the HCV program). Section 8(y) of the USHA, as*

*amended by Section 555 of QHWRA authorized the “homeownership option” under the HCV program.*

*Under the HCV program, the Department enters into an Annual Contributions Contract (ACC) with PHAs to assist very low-income families to lease or purchase safe, decent, and affordable housing. PHAs are required to maintain complete and accurate program and accounting records in accordance with HUD requirements; in a manner that permits a speedy and effective audit. PHAs must maintain records on eligibility (e.g., verification of income, disability status and citizenship); records of subsidized units (e.g., unit inspection reports, rent reasonableness documentation, tenant leases and housing assistance payments (HAP) contracts); and accounts and other records supporting PHA budget and financial statements for the program (e.g. HAP registers which document payments to landlords).*

*Voluntary transfers of HCV program units and budget authority under a proposed PIH notice, sets the requirements for such transfers. Such transfers include notification of both the divesting PHA and receiving PHA to their respective field office. Receiving PHAs are responsible for notifying all affected landlords and families of the transfer.*

*Section 8(o)(13) of the USHA allows PHAs to project-base a portion of their tenant-based vouchers.*

*Authorities for the information collection (including social security numbers) under this PRA are: USHA of 1937 (42 U.S.C. 1437 et.seq); Housing and Community Development Act of 1987 (42 U.S.C. 3543); Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d); Fair Housing Act (42 U.S.C. 3601-19); Section 904 of the Section 904 of the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by Section 903 of the Housing and Community Development Act of 1992 and Section 3003 of the Omnibus Budget Reconciliation Act of 1993 (42 U.S.C. 3544).*

**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?)**

*Information regarding the MIS (former PIC) system from which personal identifiable information can be collected is covered under Unique Identifier: 02500010601000000301093.*

**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?

*Authorization for the Release of Information/Privacy Act Notice (form HUD-9886)*

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

*Section 904 of the Stewart B. McKinney Homeless Assistance Amendments Act of 1988, as amended by Section 903 of the Housing and Community Development Act of 1992 and Section 3003 of the Omnibus Budget Reconciliation Act of 1993 requires the signing of a consent form authorizing HUD and/or the Housing Agency to request verification of salary and wages from current or previous employers; to request wage and unemployment compensation claim information; and to request certain tax return information and independent verification of income information.*

- 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. All information received by HUD or the Housing Agency*

*may be used to determine a family's eligibility and continued eligibility for the Housing Choice Voucher program.*

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

NA

Confidentiality	<input type="checkbox"/>	<b>Low</b>	<input type="checkbox"/>	<b>Moderate</b>	<input type="checkbox"/>	<b>High</b>	<input type="checkbox"/>	<b>Undefined</b>
Integrity	<input type="checkbox"/>	<b>Low</b>	<input type="checkbox"/>	<b>Moderate</b>	<input type="checkbox"/>	<b>High</b>	<input type="checkbox"/>	<b>Undefined</b>
Availability	<input type="checkbox"/>	<b>Low</b>	<input type="checkbox"/>	<b>Moderate</b>	<input type="checkbox"/>	<b>High</b>	<input type="checkbox"/>	<b>Undefined</b>

## **SECTION II - Existing System or Project**

**(Only complete Section II if this is an existing system, information collection, or project).**

**QUESTION 1: When was the system, information collection, or project developed?**

*The Housing Choice Voucher program began in 1984 and is authorized by Section 8 of the United States Housing Act of 1938.*

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

*Additional forms and documents have been added to the information collection.*

**QUESTION 3: 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 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. *The Voucher Management System (VMS) which collects aggregate sums of families served and per unit costs was developed in 2002.*
- 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 5: 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:
REVIEWERS 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.

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

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

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