



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

Initial Privacy Assessment

**Core Performance Reporting
Office of Strategic Planning and Management**

April 8, 2016

INITIAL PRIVACY ASSESSMENT (IPA)

The Initial Privacy Assessment (IPA) is used 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.

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

Privacy@hud.gov

If a PIA or SORN is required, a copy of the PIA and SORN 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).

INITIAL PRIVACY ASSESSMENT (IPA) SUMMARY INFORMATION

Date Submitted for Review: Original request received 3/4/2016. Revised request received 4/8/2016

Name of System or Project: Core Performance Reporting

System Name in CSAM: Not a HUD system. HUD is using shared service at HHS Grant Center of Excellence, GrantSolutions.

Name of Program Office: Office of Strategic Planning and Management, Grants Management and Oversight Division

Name of Project Manager: Thaddeus Wincek

Email for Project Manager: thaddeus.d.wincek@hud.gov

Phone Number for Project Manager: 202-402-6617

Type of Project:

- Information Technology and/or System
- A Notice of Proposed Rule Making or a Final Rule:
- Form or other Information Collection:
- Other:

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

Implementation of Core Performance Reporting will enable HUD to better manage and assess the effectiveness of its discretionary or competitively-funded grant awards and related programs on an annual basis. A key component of this project is ensuring discretionary grant awards are clearly focused on outcomes and efforts to continually improve these outcomes while ensuring comparability of data through the standardization of data element definitions and data collection requirements. The proposed reporting requirements align with goals and objectives identified in the Notices of Funding Availability.

Grantees will enter data into GrantSolutions, the shared service grants system operated by the Grants Center of Excellence (CoE) at HHS. When grantees submit data, the appropriate HUD staff will be notified via email from GrantSolutions. To view submitted data, HUD staff (based on role and responsibility), will log into GrantSolutions. HUD and HHS have an Interagency Agreement (IAA) that allows HUD to use the shared service.

Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: July 2015

Date last updated: February 2016

2. From whom do you collect, process, or retain information on:

HUD Employees

State and local governments and nonprofits working on behalf of HUD

The Public

The System does not contain any such information.

3. Do you use or collect Social Security Numbers (SSN's)? 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:

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

The record-level data submitted by grantees and maintained by the Department will not contain any personally identifying information (e.g., names, Social Security Numbers, birth dates, physical addresses, etc.). Each grantee will submit record-level reports to the Department each year, but it will submit these reports using unique individual identifiers developed and known only by the grantee. The unique identifiers will not contain any

personally identifiable information. Annual progress reports will not contain any protected personal information.

5. **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.

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

- No.
- Yes. Please list the systems:

7. **Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)? NO**

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; **NO**
 - Contains at least one other item of personal data (such as home address, performance rating, blood type, etc.); and **NO**
 - 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: 4/8/16

Original IPA received March 3rd. Program office revision received April
8th

Name of the HUD Privacy Branch Reviewer: Conique Key

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: _____

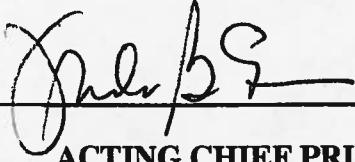
Determination

- 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:

PRIVACY REVIEWING OFFICIALS NAME: Conique key

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.

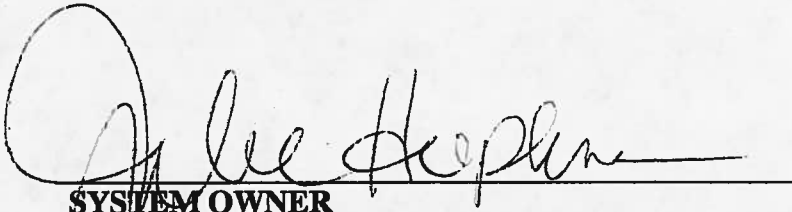


ACTING CHIEF PRIVACY OFFICER

**Frieda B. Edwards
OFFICE OF ADMINISTRATION**

4-11-16

Date



**SYSTEM OWNER
Julie Hopkins, Division Director
Grants Management and Oversight
Office of Strategic Planning and Management**

Date

4/11/16