



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

Initial Privacy Assessment

Debts Owed to Public Housing Agencies and Terminations

OMB Control # 2577-0266

**Office of Public and Indian Housing
Real Estate Assessment Center**

April 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 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:

Name of System or Project: [Debts Owed to PHAs and Terminations](#)

System Name in CSAM: Enterprise Income Verification System

Name of Program Office: [PIH/REAC](#)

Name of Project Manager or System Owner: Larry Tipton

Email for Project Manager or System Owner: Larry.R.Tipton@HUD.gov

Phone Number for Project Manager or System Owner: [202-475-8746](tel:202-475-8746)

Type of Project:

- ☐ Information Technology and/or System
- ☐ A Notice of Proposed Rule Making or a Final Rule:
- ☒ Form or other Information Collection:
- ☐ Other: [<Please describe the type of project including paper based Privacy Act system of records.>](#)

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

The EIV Debts Owed module is a national repository of families that owe a debt to a PHA and/or have been terminated from a federally assisted housing program. Only PHA authorized EIV users access the information in the module when determining a family's suitability for rental assistance. PHAs, in accordance with their policies, may deny Federal housing assistance to families who either: 1) owe a debt to a PHA; or 2) have previously been unable to comply with HUD program requirements.

At the end of a family's participation in a Federal housing assistance program (EOP), PHAs enter the following information in the Debts Owed module, as applicable:

1. Amount of debt owed by the former tenant to a PHA;
2. Indication of executed repayment agreement;
3. Indication of bankruptcy filing;

The reason for an adverse termination of the family from a Federally assisted housing program.

Pursuant to 24 CFR 5.233, these PHAs are required to use HUD's Enterprise Income Verification (EIV) system to verify employment and income information of program participants and to reduce administrative and subsidy payment errors. PHAs also use the information in the Debts Owed module, which identifies families who no longer participate in assisted housing programs due to adverse termination of tenancy and/or assistance, and owe a debt to a PHA, in determining eligibility for assistance and continued program participation pursuant to 24 CFR 982.552 and 960.203.

2. Status of Project:

☐ This is a new development effort.

☒ This is an existing project.

Date first developed:

Date last updated:

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

☐ 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:

24 CFR§5.216, (b) Disclosure required of assistance applicants. Each assistance applicant must submit the following information to the processing entity when the assistance applicant's eligibility under the program involved is being determined. (1) The complete and accurate SSN assigned to the assistance applicant and to each member of the assistance applicant's household. This information is captured on the form HUD 50058, Family Report (OMB approval number 2577-0083, expiring 11/30/2016), on which families provide the confidential information that respondents may use when entering data in the EIV Debts Owed module, includes a Privacy Act statement advising the family that the information on the form (PII) is confidential and protected by the Privacy Act of 1974 (5 USC 552a). The Privacy Act statement also informs the family that the collection is mandatory and the information requested is required to obtain and retain benefits pursuant to 24 CFR part 5 subpart B.

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

1. Amount of debt owed by the former tenant to a PHA;
2. Indication of executed repayment agreement;
3. Indication of bankruptcy filing;
4. The reason for an adverse termination of the family from a Federally assisted housing program.

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: PIC, TRACS, (HUD Internal Systems)

Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?

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.

SYSTEM OWNER

Date

<< INSERT NAME/TITLE>>

<<INSERT PROGRAM OFFICE>>

PROGRAM AREA MANAGER

Date

<<INSERT NAME/TITLE>>

<<INSERT PROGRAM OFFICE>>

CHIEF PRIVACY OFFICER

Date

<<INSERT NAME/TITLE>>

OFFICE OF THE EXECUTIVE SECRETARIAT