

# Departmental Clearance & Approval Record

U.S. Department of Housing and Urban Development  
Office of Administration

Note to Clearing Offices: If your response has not been received by the Deadline Date, the Originating Office may proceed without it.

1. Job Control Number(s) 2506-new	2. Classification Number	3. Type of Action <input checked="" type="checkbox"/> Clearance <input type="checkbox"/> Final Clearance <input type="checkbox"/> Reclearance <input type="checkbox"/> Approval	4. Deadline Date <b>July 6, 2016</b>
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5. Complete Title  
**Veterans Home Rehabilitation Program**

6. Principal Audience or User <input checked="" type="checkbox"/> HUD Staff <input checked="" type="checkbox"/> Program Participants	6a. Proposed Distribution (spell-out, do not use codes)
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7. Person most familiar with the Document Jackie Williams	7a. Organization Code / Office CPD/RED	7b. Telephone Number 202.402.4611	7c. Room 7240
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8. Type of Document

New Handbook     Handbook Revision     New Form     Federal Register Notice     Regulation     Other (specify)  
 Handbook Change     Notice     Form Revision     Publication     Special Directive     OMB Collection

9. Mark the organization(s) reviewing this document (specify under "other" the HQ/Field staff components within the reviewing offices, e.g., admin officers)

ADM     GNMA     PIH     Chief Proc. Ofcr.     S/Departmental EEO     CIR     Public Affairs     Enf. Ctr.  
 CPD     H     OGC     CFO     S/Labor Relations     S/SDBU     CIO     Other  
 ADSFM     IG     PD&R     FHEO     S/Lead Hazard Control     REAC     PECO

10. Front-End Risk Analysis <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed	11. Information Collection Requirements (Paperwork Reduction Act) <input type="checkbox"/> Completed <input checked="" type="checkbox"/> In Process <input type="checkbox"/> Not Needed	12. Impact on Small Entities (Regulatory Flexibility Act) <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed	13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Policy Act) <input type="checkbox"/> EIS Required <input type="checkbox"/> FONSI Required <input checked="" type="checkbox"/> FONSI Not Required
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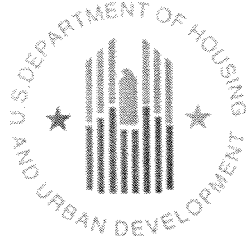
14. Organization	Signature & Title of Clearing/Approving Official	Date	Concur (no comments)	Concur (comments attached)	Non-Concur (comments attached)
Admin	Helen Goff Foster (Privacy Officer)	9/15/2016	<input checked="" type="checkbox"/>		

15. List HQ/Field components involved in developing the document (drafts, discussions, etc.)

16. Comments:

IF THIS RESPONSE IS NOT RECEIVED BY THE DEADLINE DATE, YOUR CONCURRENCE WILL BE ASSUMED. IN ACCORDANCE WITH HUD HANDBOOK 2400.3, ATTACHED IS A REPORTING REQUIREMENT FOR YOUR REVIEW.

17. Return this record to Urnell Johnson-Spears	17a. Telephone Number (202) 402-4376	17b. Room 7233
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**U.S. DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT**

**Initial Privacy Assessment**

**Veterans Home Rehabilitation Program (VHRP)**

**Office of Rural Housing and Economic Development**

**May 20, 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

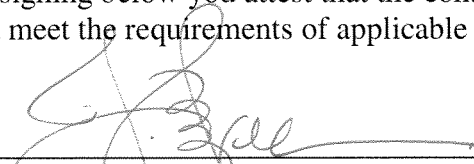
[Privacy@hud.gov](mailto:Privacy@hud.gov)

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](mailto:privacy@hud.gov) to complete and return.

**DOCUMENT ENDORSMENT**

DATE REVIEWED: 9/7/2016
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.



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**Jackie L. Williams**  
CPD/Office of Rural Housing and Economic  
Development

*22 September 2016*  
**Date**



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**CHIEF PRIVACY OFFICER**  
  
Helen Goff Foster  
**OFFICE OF ADMINISTRATION**

*9/15/2016*  
**Date**

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

**Date reviewed by the HUD Privacy Branch:** 9/7/2016

**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:**

**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

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.)? 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;

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.

## SPECIFIC QUESTIONS

**Describe the project and its purpose:** The Housing Assistance for Veterans (HAVEN) Act of 2013 (Consolidated Appropriations Act, 2016, Section 1079 (Public Law 113-291)) establishes the Veterans Home Rehabilitation Pilot Program. The purpose of the Veterans Home Rehabilitation Program is to award grants to nonprofit veterans service organizations to rehabilitate and modify the primary residence of disabled and income veterans. The program goal is to support eligible activities that serve the following objectives: 1) modify and rehabilitate the primary residence of disabled and low-income veterans; 2) rehabilitate such residence that is in a state of interior and exterior disrepair; and 3) install energy efficient features or equipment.

**1. 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:

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

Information about individuals will not be collected, generated or retained by this project.

No information will be generated, collected, or retained such as names, addresses, e-mails, etc.



**INITIAL PRIVACY ASSESSMENT (IPA) SUMMARY INFORMATION**

Date Submitted for Review: **May 20, 2016**

Name of System or Project: **Veterans Home Rehabilitation Program**

System Name in CSAM: \_\_\_\_\_ <Please enter the name.>

Name of Program Office: **CPD/Office of Rural Housing and Economic Development**

Name of Project Manager or System Owner: **Jackie L. Williams**

Email for Project Manager or System Owner: jackie.williams@hud.gov

Phone Number for Project Manager or System Owner: **(202) 402-4611**

Type of Project:

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