



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

Initial Privacy Assessment

[NPDMS]

[Office of Single Family Housing]

[May 2016]

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.

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: 5/20/16

Name of System or Project: [NPDMS \(Nonprofit Data Management System\)](#)

System Name in CSAM: NPDMS

Name of Program Office: [Office of Single Family Housing](#)

Name of Project Manager or System Owner: [Ivery Himes, Director, Office of SF Asset Management](#)

Email for Project Manager or System Owner: ivery.w.himes@hud.gov

Phone Number for Project Manager or System Owner: (202)402-1475

Type of Project:

- Information Technology and/or System
- A Notice of Proposed Rule Making or a Final Rule:
- Form or other Information Collection:
- Other: **100% Electronic. To ease the burden of drafting, photocopying and mailing paper applications and supporting documents to HUD, FHA developed NPDMS. NPDMS serves as a means for nonprofit entities to apply to the program and submit program data required by FHA through the transferring of files. The NPDMS will collect, store and provide web-based access to participants' application and property activity data.**

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

Information is collected from nonprofit applicants wanting to participate in FHA's Single Family activities, including purchasing discounted HUD Homes, serving as mortgagors, and offering secondary financing assistance. To ease the burden of drafting, photocopying and mailing paper applications and supporting documents to HUD, FHA has developed NPDMS. NPDMS will serve as a means for nonprofits to apply to the program and submit program data required by FHA. The NPDMS will collect, store and provide web-based access to participants' application and property activity data. The system will enhance FHA's ability to manage an organization's program activities from initial application/re-certification through the entire life cycle of program activities. Additionally, NPDMS will enable nonprofit users to submit required property reports online.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: January 28, 2010

Date last updated: April 2016

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: Nonprofit Organizations

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:

Nonprofits submit applications to HUD to participate in our FHA

Nonprofit Program. HUD requires that the Nonprofits Board of

Directors submit their social security numbers as a risk mitigation tool. HUD is authorized to collect social security numbers for this purpose under 42 U.S.C 35449(b) and 31 U.S.C 7701. Approval in FHA Nonprofit programs permit nonprofits to engage in activities that could impact our Mortgage Insurance Fund. Therefore, it is imperative that we undertake an evaluation of those individuals who have decision making authority within nonprofit organizations.

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

HUD collects names, addresses, email addresses, financial data, social security numbers, and employment history. HUD has authority to collect and maintain Personally Identifiable Information (PII) pursuant to 42 U.S.C 35449(b).

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.

[<Please list the data elements in the log.>](#)

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

No.

Yes. Please list the systems: Nonprofits upload PII into NPDMS securely.

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: This question does not apply as it is part of Information Collection Request (2502-0540) on Nonprofits participating in FHA's Single Family Activities.

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