

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

**INITIAL PRIVACY ASSESSMENT  
(IPA)**

**HUD 50058 Family Report and HUD  
50058 MTW**

**Moving to Work, Office of Public  
Housing Investment, Public and  
Indian Housing**

**Instruction & Template**

August 04, 2016

## **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 Personally 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, Paperwork Reduction Act Compliance Officers), 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

## INFORMATION ABOUT THE SYSTEM OR PROJECT

**Date Submitted for Review:** 7-31-12

**Project Name/Acronym:** HUD 50058 MTW – Attachment B of MTW Standard Agreement

**System Owner/Contact information:** Ivan Pour 202-402-2488  
Ivan.M.Pour@hud.gov

**Project Leader/Contact Information:** Ivan Pour 202-402-2488  
Ivan.M.Pour@hud.gov

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

- Paper-Only
- Combination of Paper and Electronic
- System
- Other:** Please describe below the type of project or system, including paper based Privacy Act System of Records, Rules, or Technologies'. Also, indicate whether this is a revision/update for an existing system or project.

**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.

**Section I: The Entire IPA (Sections I and II) Should be Completed for New Systems or Projects. If this is an Existing System or Project Skip to Section II. Unless requested by the Office of Privacy, this section should not be completed for an existing System or Project.**

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

- a. From whom is the information collected (i.e., government employees, contractors, or consultants, state, local government entities, or general public)?

This information is collected from participants in the Office of Public and Indian Housing's public housing and housing choice voucher (HCV programs). Public Housing Agencies are typically chartered independent entities established by the state legislature to administered affordable housing programs in a jurisdiction. Some are units of local government.

- b. What is the functionality of the system, information collection, or project and the purpose that the records and/or system serve?

Form 50058 and 50058-MTW family reports solicit demographic, family profile, income and housing information on the entire nationwide population participating in the public housing and voucher programs. This information is utilized for the subsequent purposes:

- Analyze public housing and housing choice voucher programs;
- Permit PHAs to monitor their own reporting to identify favorable and unfavorable trends;
- Monitor PHAs and participants for compliance with program regulations and requirements;
- Fraud detection and prevention via rent/income monitoring;
- Housing inventory and development of program initiatives with emphasis on the housing of special needs group; and
- Make available accurate demographic information depicting tenant characteristics to Congress and other interested parties.

- c. How is information transmitted to and from the system, information collection, or project?

The PHA generates an electronic version of the 50058 and 50058-MTW. These electronic versions are submitted electronically by the PHAs into the PIH Information Center (PIC) on a monthly basis. PIC is an automated database system which also serves as an archive for this data, and is accessible to HUD headquarters and field offices.

- d. What are the interconnections with other systems or projects?

Information in PIC is used to assess occupancy in public housing and calculate Operating

Subsidy for MTW agencies who receive their operating subsidy according to 24 CFR 990.

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

No. The HUD-50058 is a legacy collection of information that has been in place for over 30 years, and thus predates this requirement. The MTW version is a derivation of this form.

**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.

PIH has been collecting information on the HUD Form 50058 for over 30 years.

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

YES	NO	<b>Does the system, information collection, or project collect personal/sensitive information?</b> (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?
<input type="checkbox"/>	<input type="checkbox"/>	

**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)?**

For each household member, the Form 50058 and 50058MTW collect name, address, social security number, ethnicity, race, citizenship, gender, assets, income, and expected income. Additional data is collected for the head of household on employment status, assistance received under other federal assistance programs (TANF, Medicaid, etc.) and benefits such as health insurance provided by employers.

Authorities to collect this information include:

- The United States Housing Act of 1937 (42 U.S.C 1437 et seq.)
- Title VI of the Civil Rights Act of 1964 (42 U. S. C. 2000d) and by the Fair Housing Act (42 U. S. C. 3601-19)
- Quality Housing and Work Responsibility Act of 1998 (Public Law 105-276 Title V)
- HUD Appropriations Act of 1996 (Public Law 104-134 Section 204)
- “Electronic Transmission of Required Family Data for Public Housing, Indian Housing, and the Section 8 Rental Certificate, Rental Voucher, and Moderate Rehabilitation Programs” (24 CFR Part 908)
- 24 CFR 5.216

**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?)

Yes.

**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?

Yes. Participants are required to fill out and sign HUD Form-9886 *Authorization for the Release of Information/Privacy Act Notice* (attached), authorizing the collection of information, and its intended uses.

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

Yes, using the Form HUD-9448, applicants and program participants are provided an opportunity to decline to provide 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?

By signing the form HUD-9448, they consent to the use of collecting this data for income verification and rent setting purposes, in order to receive benefits under the program, and for other monitoring purposes. Residents are not given additional opportunity to give consent for other uses of Form 50058 or Form 50058 MTW data.

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

N/A

Specify below the systems categorization. If not available identify the FISMA-reported system whose Certification and Accreditation covers this system.

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 - The Entire IPA should be completed for New Systems or Projects. If this is an Existing System or Project Complete Only Complete This Section.**

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

The Form HUD-50058 was developed over 30 years ago. The Form 50058-MTW was developed in 2006, as a module was added to the Public and Indian Housing Information Center (PIC) to allow it to capture this information.

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

Yes, the information collection has been revised since April 17, 2003.

**QUESTION 3: If an existing system, information collection, or project, has the system or project, explain the changes the system or project will be undergoing as part of this renewal/update process.**

This is a revision to a currently approved collection.

- The changes in the calculations in #13 and Supporting Statement #12 are due to the MTW Program increasing from 25 participating housing agencies at the time of the last form approval to 39 housing agencies at this time.
- The main reason for the form change is to add the ability to collect information on local, non-traditional families.
  - The current 50058-MTW is not set up to collect this information. Therefore, there are families that MTW agencies are serving that are not being reported on in the PIC system.
  - This is causing an undercounting of families served with MTW funds. Also, there were five MTW agencies added since this form was last updated.
  - This increase in participation in the MTW program has increased the number of respondents and the burden hours. The MTW program has added Tacoma, Orlando, Champaign, Boulder and Lexington-Fayette housing authorities.
- The other minor change is a clarification to add category of H = Traditional Homeownership in Section 1.c. This category is currently accepted and data is collected in Section 22, but is not listed in the choices under 1.C.

The changes to the form are as follows:

- Create a Local, Non-Traditional Assistance “LN” program code categorization in Section 1.C Form 50058-MTW to track households that are provided assistance through local, non-traditional MTW programs in addition to public housing, tenant-based and project-based assistance.
- Add the categories of H = Traditional Homeownership. This category is currently accepted but is not listed in the choices under 1.C, so this is a clarification.
- Add LH = Local, Non-Traditional Homeownership which is another classification for homeownership assistance that does not fall under Sections 8 and 9 of the 1937 Act and thus needs the Local, Non-Traditional categorization.
- Add Local, Non-Traditional Assistance to the heading of Section 21 of Form 50058-MTW to allow detailed reporting on this type of assistance.
- Add LH = Local, Non-Traditional Homeownership to Section 22 of Form 50058-MTW to allow detailed reporting on this type of assistance.

**QUESTION 4: 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?**

The changes will involve a change to the type of records maintained because MTW agencies will be required to report on families that receive Local, Non-traditional assistance through the MTW program. Currently assistance to these individuals is not able to be captured or counted in the PIC system, thus MTW agencies are undercounting the number of families that they are serving. The information will not be used in any different way than the current information in the system.

**QUESTION 5: 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.
- 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 6: 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:
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.

<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	