

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

**INITIAL PRIVACY ASSESSMENT (IPA)**

**Family Options Study Long-term Tracking**

**Office of Policy Development & Research**

**November 22, 2016**

**INITIAL PRIVACY ASSESSMENT (IPA)**

**SUMMARY INFORMATION**

<b>Project or Program Name:</b>	Family Options Study (aka: The Impact of Housing and Services Interventions on Homeless Families)		
<b>Program:</b>	Policy Development and Research (PD&R)		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	N/A
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Modification
<b>Date first developed:</b>	June 1, 2010	<b>Pilot launch date:</b>	September 1, 2010
<b>Date of last IPA update:</b>	November 25, 2013	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	Not started	<b>ATO expiration date (if applicable):</b>	N/A

**PROJECT OR PROGRAM MANAGER**

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**INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)**

<b>Name:</b>	N/A		
<b>Phone:</b>	N/A	<b>Email:</b>	N/A

The objective of this new data collection is to conduct sample tracking to locate and re-engage the study sample, and to collect updated contact information. The same data will be collected from each respondent. As a result, the tracking survey will collect the following information from survey respondents: name, address, telephone number, e-mail address, as well as information on a small number of key items: housing stability, use of homeless and housing assistance programs, family composition, and employment status.

**4(a) Does the project, program, or system retrieve information from the system about a U.S. Citizen or lawfully admitted permanent resident aliens by a personal identifier?**

- No. Please continue to next question.  
 Yes. If yes, please list all personal identifiers used: Personally Identifying Information (PII) collected includes: name, social security number, a participant study ID (a randomly generated number assigned to each family as they enter the study), birth date, home address, telephone number, and personal e-mail address.

**4(b) Does the project, program, or system have an existing System of Records Notice (SORN) that has already been published in the Federal Register that covers the information collected?**

- No. Please continue to next question.  
 Yes. If yes, provide the system name and number, as well as the Federal Register citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system. An initial Systems of Records Notice (SORN) regarding this system was published in the Federal Register on Monday, October 4, 2010 (Volume 75, No. 191, pp. 61169-61171). The SORN was revised in 2014 at the time of the 36-month data collection due to a set of expanded categories of records (Volume 79, No. 38, pp. 10823-10825).

**4(c) Has the project, program, or system undergone any significant changes since the SORN?**

- No. Please continue to next question.  
 Yes. If yes, please describe.

**4(d) Does the project, program, or system use Social Security Numbers (SSN)?**

- No.  
 Yes.

**4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:**

The authority for the collection of the data and the maintenance of this system can be found at Sec. 501, 502, Housing and Urban Development Act of 1970 (Pub.L. 91-609), 12 U.S.C. 1701z-1, 1701z-2.

**4(f) If yes, please describe the uses of the SSNs within the project, program, or system:**

Analysis records will be identified with a randomly generated study identification number that is unrelated to personal information such as SSN, DOB, or name. The study identifier can be linked to the personal identifying information only by a small number of central research staff at Abt Associates.

<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b></p>	<p>Choose an item.</p> <p>Please describe applicable information sharing governance in place:</p> <p>Current contracts PSC IDIQ Contract # HSP233201500069I; Task Order: HHSP23337005T and HUD contract DU206SF-13-T-00005 govern data sharing between Abt and HUD.</p>
<p><b>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all HUD personnel?</b></p>	<p><input type="checkbox"/> No.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list: Abt provides all project staff with HIPAA Rules of the Road – Practical Information for Ensuring Compliance; IRB 101 Training; General Security Awareness Training; CITI Human Subjects Training. All study team members also undergo project specific training on maintaining privacy, and safe data storage and handling procedures.</p>
<p><b>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?</b></p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: HUD does not hold the PII for study participants, and therefore would be unable to disclose PII to individuals or agencies requesting such data. In addition, as an added precaution, HUD's contractor who holds the study data, Abt Associates, maintains a Certificate of Confidentiality from the National Institutes of Health for the data system, which allows the firm to refuse to disclose names or other identifying characteristics of research subjects in response to legal demands.</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input checked="" type="checkbox"/> Unknown.</p> <p><input type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p>

<sup>4</sup> FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

- HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies.
- Privacy Act Statement required.
- Privacy Impact Assessment (PIA) required.x
- System of Records Notice (SORN) required.x
- Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.
- A Records Schedule may be required. Contact your program Records Officer.

<b>PIA:</b>	Choose an item. If covered by existing PIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>HUD Privacy Branch Comments:</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<a href="#">Click here to enter text.</a>	

