U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

INITIAL PRIVACY ASSESSMENT (IPA)

Small Area FMR Demonstration Evaluation

Policy Development and Research

Instruction & Template

2/9/2017

INITIAL PRIVACY ASSESSMENT (IPA)

The IPA is a compliance form developed by the Privacy Branch to identify the use of Personally Identifiable Information (PII) across the Department. The IPA is the first step in the PII verification process, which focuses on the following areas of inquiry:

- Purpose for the information,
- Type of information,
- Sensitivity of the information,
- Use of the information,
- And the risk to the information.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 or a System of Record Notice (SORN) is required under the Privacy Act of 1974, as amended.

Please complete this form and send it to your program Privacy Liaison Officer (PLO). If you do not have a program Privacy Liaison Officer, please send the IPA to the HUD Privacy Branch:

Marcus Smallwood, Branch Chief
Privacy Branch
U.S. Department of Housing and Urban Development

privacy@hud.gov

Upon receipt from your program PLO, the HUD Privacy Branch will review this form. If a PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return.

INITIAL PRIVACY ASSESSMENT (IPA)

SUMMARY INFORMATION

Project or Program Name:	Small Area FMR Demonstration Evaluation		
Program:	Policy Development and Research (PD&R)		
CSAM Name (if applicable):	N/A	**CSAM Number (if applicable):**	N/A
Type of Project or Program:	Form or other Information Collection	**Project or program status:**	Development
Date first developed:	N/A	**Pilot launch date:**	N/A
Date of last IPA update:	N/A	**Pilot end date:**	N/A
ATO Status (if applicable)	Not started	**ATO expiration date (if applicable):**	N/A

PROJECT OR PROGRAM MANAGER

Name:	Marie Lihn		
Office:	PD&R	**Title:**	Economist, REE
Phone:	202-402-2409	**Email:**	Marie.l.lihn@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	**Email:**	Click here to enter text.

SPECIFIC IPA QUESTIONS

1. Reason for submitting the IPA: Choose an item.
Please provide a general description of the project and its purpose in a way a non-technical person could understand. If this is an updated IPA, please describe what changes and/or upgrades that are triggering the update to this IPA. If this is a renewal please state whether or not there were any changes to the project, program, or system since the last version.
This IPA is being submitted as a part of an Information Collection Request (ICR) to be submitted to OMB. This is a data collection effort to interview Housing Choice Voucher (HCV) program tenants and landlords participating in the Small Area Fair Market Rent (FMR) Demonstration, as well as landlords who could potentially rent units in the HCV program, for their insights into the program. The interviews are planned to be conducted during site visits to the five PHAs participating in the SAFMR demonstration and two of the six PHA using SAFMRs as part of a court settlement. Site visits will be completed by a contractor as part of a grant that is evaluating the use of Small Area FMRs. Following the completion of the site visits, all site visitors will meet to compare findings across sites and identify themes from the interviews. The interviews will serve as the primary qualitative data sources from the site visits and will be used in conjunction with the study's other data sources to conduct the final analysis and complete the final report.

2. Does this system employ any of the following technologies? *If you are using any of these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.*	☐ Social Media ☐ Web portal[1] (e.g., SharePoint) ☐ Contact Lists ☐ Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD ☒ None of these

3. From whom does the Project or Program collect, maintain, use, or disseminate information? *Please check all that apply.*	☐ This program does not collect any personally identifiable information[2] ☒ Members of the public (70 tenants and 35 landlords in seven sites) ☒ HUD employees/contractors (list programs): Housing Choice Voucher Program (HUD IMS/PIC)

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[1] Informational and collaboration-based portals in operation at HUD and its programs that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

[2] HUD defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this IPA, SPII and PII are treated the same.

	☐ Contractors working on behalf of HUD
	☐ Employees of other federal agencies
	☐ Other (e.g. business entity)

4. What specific information about individuals is collected, generated or retained?

To identify HCV holders as prospective interviewees, Abt Associates (HUD's contractor) will generate a list of households that meet neighborhood and mover criteria from HUD Administrative data (PIC data) that has already been provided. Data are currently anonymized from Abt's perspective (without HCV holder names, addresses, or other contact information) and include ZIP Code location, gender/sex, race/ethnicity, and income/financial data. After generating a list of households that meet the moving and neighborhood criteria, approximately 10 times as many candidate households as eventual interviewees (700 in total) will be randomly selected from the list so to ensure a sufficient number of households from which to recruit. The anonymized household identifiers for these households will be sent to HUD, and HUD will return names and addresses for these households. Abt will then provide these names and addresses to the SAFMR PHAs with a request that the PHAs provide Abt with telephone numbers and email addresses (if available) that Abt can use to contact the individuals to request an interview. Abt will work with the PHAs to obtain listings of landlord names and contact information from which to find interview candidates. At least 5 times as many names will be requested as interviewees (approximately 175 in total) to ensure a sufficient number of landlords from which to recruit.

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: HUD-generated participant ID, name, address, telephone number, personal email 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
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:	NOT APPLICABLE
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	NOT APPLICABLE

4(g) If this project, program, or system is an information 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 next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.

4(h) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	
NOT APPLICABLE	

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	☒ No. ☐ Yes. If yes, please list:
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	☒ No. ☐ Yes. If yes, please list:
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Existing Please describe applicable information sharing governance in place: Data License
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?	☒ No. ☐ Yes. If yes, please list:
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?	☒ No. What steps will be taken to develop and maintain the accounting: If the project receives requests to access study generated PII, the appropriate steps will be taken to determine whether the PII can be disclosed, and if so, how to account for the disclosures.

[3] Header: Information that is placed before the actual data. The header normally contains a small number of bytes of control information, which is used to communicate important facts about the data that the message contains and how it is to be interpreted and used. It serves as the communication and control link between protocol elements on different devices.
Payload data: The actual data to be transmitted, often called the payload of the message (metaphorically borrowing a term from the space industry!) Most messages contain some data of one form or another, but some actually contain none: they are used only for control and communication purposes. For example, these may be used to set up or terminate a logical connection before data is sent.

	☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☒ Unknown. ☐ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High Integrity: ☐ Low ☐ Moderate ☐ High Availability: ☐ Low ☐ Moderate ☐ High

INITIAL PRIVACY ASSESSMENT REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	**Ron Hill**
Date submitted to Program Privacy Office:	**June 15, 2017**
Date submitted to HUD Privacy Branch:	June 15, 2017
Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.* Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	**Conique Key**
Date approved by HUD Privacy Branch:	June 15, 2017

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[4] 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.

IPA Expiration Date:	Every 3 years

DESIGNATION

Privacy Sensitive System:	Choose an item. If "no" IPA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.

Determination:	☐ IPA sufficient at this time.
	☐ Privacy compliance documentation determination in progress.
	☐ New information sharing arrangement is required.
	☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies.
	☐ Privacy Act Statement required.
	x☒ Privacy Impact Assessment (PIA) required.
	☐ System of Records Notice (SORN) required.
	☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.
	☐ A Records Schedule may be required. Contact your program Records Officer.

PIA:	Choose an item. NA
SORN:	Choose an item.　　　　　　NA

HUD Privacy Branch Comments:
Please describe rationale for privacy compliance determination above.

Sorn may be needed.

DOCUMENT ENDORSMENT

DATE REVIEWED: 6-15-17
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.
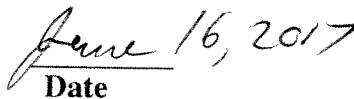

Marie L. Lihn   *June 15, 2017*

SYSTEM OWNER   **Date**

Marie Lihn
Policy Development & Research

Mark Smallwood   *June 16, 2017*

CHIEF PRIVACY OFFICER   **Date**

Marcus Smallwood
OFFICE OF ADMINISTRATION