

**U.S. Department of Housing and
Urban Development**

**Office of Policy Development and
Research**

Understanding Rapid Re-housing Study

Privacy Impact Assessment

May 23, 2017

Abstract

For the *Understanding Rapid Re-housing Study*, HUD's Office of Policy Development and Research is partnering with an external research team to collect new data to analyze the current status of the rapid re-housing (RRH) programs and the experiences of RRH participants. The project will provide HUD with a deeper understanding of how RRH programs operate and the experiences of households that use them. The *Understanding Rapid Re-housing Study* will (1) synthesize existing research on RRH programs; (2) extend the analysis of data from the Family Options Study (2016); (3) provide a detailed examination of all rapid re-housing programs, nationwide; and (4) conduct qualitative research with a small sample of families and individuals who receive RRH. The study will collect contact information from Continuums of Care (CoCs) for RRH programs, as well as personal information from participating RRH households.

Overview

The *Understanding Rapid Re-housing Study* is being conducted by Abt Associates, an independent research firm, through the Office of Policy Development and Research, under the authority of the Secretary of the U.S. Department of Housing and Urban Development. The study is meant to undertake programs of research, study, testing, and demonstration related to HUD's mission and programs (12 USC 1701z-1 et seq.).

This study provides an opportunity to address unanswered questions about RRH assistance and to gain an understanding of the status of RRH programs nationwide, as well as the experiences of RRH participants. At the program level, the new data collection and analysis will assess the current scale of RRH, document the predominant models in place for RRH programs, determine the extent to which programs use progressive engagement service approaches, and examine the way RRH programs function in rental markets with varying costs and vacancy rates.

Researchers will collect data from CoCs and RRH programs via a web-based survey and will, subsequently, collect further data through in-depth telephone interviews with 20 RRH programs. This data will be analyzed by Abt Associates and reported to HUD in a final report. Abt Associate's staff will conduct in-person interviews and meetings with RRH program participants. Data from these meetings will be collected via electronic recordings and paper surveys, and analyzed and reported on, by the researchers, in the final report to HUD. Participants will also be asked to take digital photographs of their home environments. **All data will be de-identified for reporting purposes, so no person or program will be able to be identified.**

This study has undergone Institutional Review Board (IRB) and Information Security reviews to identify privacy risks, compliance, and legal risks to HUD. All technology used will include encryption. Information will not be shared outside the members of the research team and HUD.

This project includes six instruments for data collection: (1) Web Census for CoCs and Rapid Re-housing Programs, (2) Interview Guide for Rapid Re-housing Programs, (3) Rapid Re-housing Participant Interview Guide, (4) Rapid Re-housing Participant Follow-up Interview Guide, (5) Quarterly Household Tracking Guide for Ethnographic Panel, and (6) Housing Photo Journal Guide. Of these, the first two are program-level data collections and, as such, will

include minimal personally identifiable information (PII); only the name and contact information for the program staff person completing the survey. The Rapid Re-housing Participant Interview Guide, Rapid Re-housing Participant Follow-up Interview Guide, and Quarterly Household Tracking Guide will collect information from participants via interview questions asked in person and recorded for this study. This information will be collected after obtaining written consent regarding the participants' participation.

Abt Associates will retain all data collected over the life of the study, and any analysis files generated with those data, as long as required, and only under conditions specified in the study protocol. At the end of the contract, Abt will destroy all PII, per the contract terms. The retention and disposal procedures are in keeping with HUD's records management policies as described in 44 U.S.C. 3101 and 44 U.S.C. 3303. Abt Associates will submit all de-identified data over to HUD at the end of the contract. At the end of the contract, Abt Associates will also submit the personal identifiers for those participants who gave Abt permission to release their information to HUD. The retention and disposal procedures are in keeping with HUD's records management policies as described in 44 U.S.C. 3101 and 44 U.S.C. 3303.

Section 1.0 Authorities and Other Requirements

1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The authority for the collection of the data and the maintenance of this system can be found at sections 501 and 502, Housing and Urban Development Act of 1970 (Public Law 91-609), 12 U.S.C. 1701z-1, 1701z-2. One part of HUD's established mission and responsibilities is to monitor family housing conditions and options. To evaluate the effectiveness of the programs that affect the conditions and options, HUD needs to collect participant data over time, which includes the necessary contact and tracking information. HUD issued a Request for Proposals, which was awarded to Abt Associates. The data is collected by Abt Associates, on behalf of HUD, to fulfill the contractual obligations under Requisition PSC177260; Contract HSP233201500069I; Task Order HHSP23337006T. These contracts govern data sharing between Abt and HUD.

1.2 What Privacy Act System of Records Notice(s) apply to the information?

This collection does not require a System of Records Notice (SORN), so this is not applicable

1.3 Has a system security plan been completed for the information system(s) supporting the project?

Abt complies with the Privacy Act of 1974, Health Insurance Portability and Accountability Act of 1996 (HIPAA), and the E-Government Act of 2002, including Title III, Federal Information Security Management Act (FISMA), which covers site security, security control documentation, access control, change management, incident response, and risk management.

Abt has implemented full-disk encryption (FIPS 140-2 compliant) software in our environment to protect the storage of data, as well as Huddle, a file transfer application (also FIPS 140-2 compliant), for the

secure, encrypted transmission of sensitive data, such as PII and Protected Health Information (PHI), to and from our clients and subcontractors. Huddle offers secure content collaboration to share data and is FedRAMP certified. It uses TLS (128-bit or 256-bit encryption) to encrypt data in transit and uses 256-bit AES with data at rest.

We have also implemented antimalware software in our environment and update definitions, daily, on each workstation. For boundary protection, Abt has implemented Cisco ASA firewalls.

Hard copy notes and other materials that are collected as part of the ethnographic work in Task 8 will be securely stored in locked file cabinets when not in use.

1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

Yes. 2225.6 REV-1, Appendix 67, Records Disposition Schedule 67, Policy Development and Research (PD&R), Item No. 5: Project case files reflecting a complete history of each project, from initiation, through research, development, design, testing, and demonstration.

Disposition: Retire to Federal Records Center 3 years after satisfactory close of project that volume warrants. Destroy 6 years after satisfactory close of project. (NARA Job NCI-207-78-6, item 5.

PD&R Records Disposition Schedule 67:

<https://portal.hud.gov/hudportal/documents/huddoc?id=22256x67ADMH.pdf>.

1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the Office of Management and Budget (OMB) control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

OMB Control number is pending. Sixty-day notice was published on February 7, 2017.

Section 2.0 Characterization of the Information

The following questions are intended to define the scope of the information requested and/or collected, as well as reasons for its collection.

2.1 Identify the information the project collects, uses, disseminates, or maintains.

Information collected for the Web Census for CoCs and Rapid Re-housing programs includes name and professional contact information for respondents at each CoC and program. No personally identifiable information (PII) will be collected for this program-level data collection.

PII collected for the Rapid Re-housing participant Interviews, Follow-up Interviews, Quarterly Housing Tracking Guide for Ethnographic Panel, and Housing Photo Journal Guide includes the following:

- Name
- Birth date
- Home address
- Telephone number
- Personal e-mail address

This information is used solely for identifying the study participants, during the contract period while the study is ongoing. When the contract period ends in September 2019, all PII will be destroyed by the contractor, and data will be retained only in de-identified form.

If the project or system creates new information (for example, a score, analysis, or report) describe how this is done and the purpose of that information.

This is not applicable. This study does not create new information.

If the project receives information from another system (for example, a response to a background check) describe the system from which the information originates, including what information is returned and how it is used.

The study will receive data from HUD, mostly via email, on the names of homeless programs receiving HUD funding to operate rapid re-housing (RRH) projects, as well as data from the Veterans Administration about Supportive Services for Veteran Families (SSVF) programs. This data will be used to identify the program universe for the administration of the Continuum of Care (CoC) and RRH program web survey. The study will also use data from the Annual Performance Reports submitted by CoCs and ESG grantees. As well, the study will obtain some publicly available data from the HUD Exchange website, for quantitative analysis.

2.2 What are the sources of the information and how is the information collected for the project?

No information will be collected from outside systems. All information will be collected via survey.

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

Contact information for CoCs is obtained through publicly available data from the HUD Exchange website. The study team will contact CoC staff and ask them to provide names, phone numbers, and email addresses for all RRH programs within the CoC.

Contact information for the Veteran Administration's SSVF program will be provided by the Veterans Administration.

Participants initially provided PII at the time of enrollment in the study. Updates to participant contact information are also provided by participants.

2.4 Discuss how accuracy of the data is ensured.

The project does not check for accuracy because the accuracy of the data does not impact how the RRH programs function or the services received by RRH-participating households. Also, the impact of inaccurate data has minimal impact on the study results.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

Privacy Risk: There is a low risk of the contractor losing the data collected from program participants.

Mitigation: This risk is mitigated by Abt Associates' IT security system. Abt has implemented full-disk encryption (FIPS 140-2 compliant) software in our environment to protect the storage of data, as well as Huddle, a file transfer application (also FIPS 140-2 compliant) for the secure, encrypted transmission of sensitive data, such as PII and PHI, to and from our clients and subcontractors. Huddle offers secure content collaboration to share data and is FedRAMP certified. It uses TLS (128-bit or 256-bit encryption) to encrypt data in-transit and uses 256-bit AES with data at rest.

We have also implemented anti-malware software in our environment and update definitions daily on each workstation. For boundary protection, Abt has implemented Cisco ASA firewalls. Hard copy notes and other materials that are collected as part of the ethnographic work in Task 8 will be securely stored in locked file cabinets when not in use.

Privacy Risk: There is a risk of information being compromised if a participant's contractor-issued smartphone is lost or stolen.

Mitigation: This risk is mitigated by password protection on the smartphones, as well as by the phones' being within participants' control at all times. Additionally, data recorded on the smartphones by participants that is meant to be used for the study will be securely transferred directly from the phones to encrypted Abt laptops via USB.

Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

3.1 Describe how and why the project uses the information.

Contact information for CoCs and RRH programs is used to communicate with participants (for program-level web surveys and interviews).

PII provided by program participants is used solely for identifying the study participants during the contract period, while the study is ongoing. When the contract period ends in September 2019, all PII will be destroyed by the contractor.

3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how HUD plans to use such results.

No such scoring or analysis will be completed under this project.

3.3 Are there other program offices with assigned roles and responsibilities within the system?

There is no inter- or intra-departmental sharing of this data within HUD.

3.4 Privacy Impact Analysis: Related to the Uses of Information

Privacy Risk: Because there will be no sharing of the data for this study, this is not applicable.

Mitigation: Not applicable.

Section 4.0 Notice

4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

The 60-day notice for the data collection associated with this study was published in the *Federal Register* on February 7, 2017 (Volume 82, No. 24, pp. 9591-9592).

All participants in the ethnographic research will complete the Informed Consent process and provide a written signature after being advised of the following: the authority authorizing the collection of the information; whether the disclosure of the information is mandatory or voluntary; the principal purpose(s) for which the information is to be used; the routine uses that may be made of the information; and the effects, if any, of not providing all or any part of the requested information.

4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Participation in the study is 100 percent voluntary. Providing a response to any of the survey instruments or data collection efforts, at any point in the study, whether in part or in whole, is entirely voluntary as well. Participants may opt out of any of the data collection efforts by refusing to participate in that round of data collection. Those who do consent to participate in subsequent data collections may opt out of answering a particular question or stop the interview at any time, with no penalty. To opt out of any part of the study, the participants need to inform a member of the research team.

There is no risk that households participating in the study will lose benefits they might otherwise receive. Households will enter the study after seeking assistance on their own from an emergency family homeless shelter. Participating in the study does not pose any risk of losing other benefits to which the household might otherwise be eligible.

4.3 Privacy Impact Analysis: Related to Notice

All study participants are provided with a notice stating that participation is entirely voluntarily, that agreeing or refusing to participate will not affect their housing assistance, and that all personally identifying information (PII) will be kept strictly confidential.

Privacy Risk: There is a low risk of the contractor losing the data collected from program participants

Mitigation: This risk is mitigated by Abt Associates' IT security system. Abt has implemented full-disk encryption (FIPS 140-2 compliant) software in our environment to protect the storage of data, as well as Huddle, a file transfer application (also FIPS 140-2 compliant), for the secure, encrypted transmission of sensitive data, such as PII and PHI, to and from our clients and subcontractors. Huddle offers secure content collaboration to share data and is FedRAMP certified. It uses TLS (128-bit or 256-bit encryption) to encrypt data in-transit and uses 256-bit AES with at rest.

We have also implemented antimalware software in our environment and update definitions daily on each workstation. For boundary protection, Abt has implemented Cisco ASA firewalls.

Hard copy notes and other materials that are collected as part of the ethnographic work in Task 8 will be securely stored in locked file cabinets when not in use.

Privacy Risk: There is a risk of information being compromised if a participant's contractor-issued smartphone is lost or stolen.

Mitigation: This risk is mitigated by password protection on the smartphones, as well as by the phones' being within participants' control at all times. Additionally, data recorded on the smartphones by participants that is meant to be used for the study will be securely transferred directly from the phones to encrypted Abt laptops via USB.

Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

5.1 Explain how long and for what reason the information is retained.

Abt Associates will securely retain all data collected over the life of the study, including PII from participants and any analysis files generated with those data, as long as required and only under conditions specified in the study protocol. Abt has implemented full-disk encryption (FIPS 140-2 compliant) software in their environment to protect the storage of data, as well as, Huddle, a file transfer application (also FIPS 140-2 compliant) for the secure, encrypted transmission of sensitive data, such as PII and PHI, to and from their clients and subcontractors. Huddle offers secure content collaboration to share data and is FedRAMP certified. It uses TLS (128-bit or 256-bit encryption) to encrypt data in-transit and uses 256-bit AES with data at rest.

They have also implemented antimalware software in their environment and update definitions daily on each workstation. For boundary protection, Abt has implemented Cisco ASA firewalls.

At the end of the contract (October 2019), Abt will destroy records that do not need to be retained. Study participant PII to be retained (and then destroyed at the end of the contract period, in October 2019) include the following:

- Name
- Birth date
- Home address
- Telephone number
- Personal e-mail address

The retention and disposal procedures are in keeping with HUD's records management policies as described in the section below:

2225.6 REV-1, Appendix 67, Records Disposition Schedule 67, Policy Development and Research, Item No. 5: Project case files reflecting a complete history of each project, from initiation, through research, development, design, testing, and demonstration.

Disposition: Retire to Federal Records Center 3 years after satisfactory close of project that volume warrants. Destroy 6 years after satisfactory close of project. (NARA Job NCI-207-78-6, item 5)

PD&R Records Disposition Schedule 67:

<https://portal.hud.gov/hudportal/documents/huddoc?id=22256x67ADMH.pdf>

5.2 Privacy Impact Analysis: Related to Retention

Privacy Risk: There is a low risk of the contractor losing the data collected from program participants while the study is in progress.

Mitigation: This risk is mitigated by Abt Associates' IT security system. Abt has a dedicated Analytic Computing Environment (ACE3) for use in storing ONLY sensitive information, such as PII and PHI. Only authorized personnel can access this environment through a virtual private network. Authentication to the system is done through Active Directory and DUO multi-factor authentication. Users connect to the system through remote desktop sessions. ACE3 is FISMA and FIPS 140-2 compliant.

Privacy Risk: There is a risk of information being compromised if a participant's contractor-issued smartphone is lost or stolen.

Mitigation: This risk is mitigated by password protection on the smartphones, as well as by the phones' being within participants' control at all times. Additionally, data recorded on the smartphones by participants that is meant to be used for the study will be securely transferred directly from the phones to encrypted Abt laptops via USB.

Section 6.0 Information Sharing

6.1 Is information shared outside of HUD as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

This is not applicable. Information will not be shared outside of HUD.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

No data will be provided to external agencies.

6.3 Does the project place limitations on redissemination?

Provisions in the contract specifically prohibit sharing any PII with other agencies. Thus, this is not applicable.

6.4 Describe how the project maintains a record of any disclosures outside of the Department.

HUD does not hold the PII for study participants and, therefore, would be unable to disclose PII to individuals or agencies requesting such data. The contractor, Abt Associates, has a dedicated Analytic Computing Environment (ACE3) use in storing ONLY sensitive information, such as PII and PHI. Only authorized personnel can access this environment through a Virtual Private Network. Authentication to the system is done through Active Directory and DUO multi-factor authentication. Users connect to the system through remote desktop sessions. ACE3 is FISMA and FIPS 140-2 compliant.

To ensure data privacy and security, the Abt Conformat Horizons web survey platform that will be used for the CoC and RRH program web survey allows for tight control over sampling, respondent recruitment, and data acquisition, while addressing both data security and confidentiality concerns. Conformat invests considerable time updating the software to ensure it has the latest technologies to boost security, performance, and reliability. Respondents will access the RRH web survey through Abt's website, where they will be protected by Abt's strict data security system. HTTPS is enforced for transmission of all Conformat Horizons credentials, by Abt, at the user level. All user accounts are named users linked to individual email addresses, except for a translation account with extremely limited rights, which is provided by the software vendor. Strong password policies are enforced, including minimum length, mixed case, special characters, and a password expiry after a set number of days. A password history is kept to prevent passwords from being continuously reused. Accounts are locked by the system after five consecutive failed login attempts. Upon entering a 7-digit personal identification number assigned by the software, the respondent moves to a nonpublic directory that is inaccessible through the Internet.

As data are entered, they are stored on a second nonpublic directory that is accessible only to the Abt system administrator. Partial responses are saved in this way. Once respondents finish the census and press the "Submit" button on the screen, the personal identification number used to access the survey becomes invalid, and the instrument cannot be accessed again with that number. The SQL server databases that store respondent/response data are behind the firewall, and data can be accessed only through the Confirmit Horizons application, by our named users. No application users can access the database directly. The servers are accessible only by our database administrators.

Confirmit surveys are stateless and sessionless. No user identifiable information is required when transmitting information between page submissions. A combination of hidden form fields and system-generated identifiers are able to identify a respondent and the correct state when moving from page to page. Pages use metadata code to prevent them from being cached, and no information is stored on a respondent's computer when the browser is closed.

Abt takes every precaution to ensure that data collected on the Internet remain both secure and confidential. All Abt data collection servers are housed in an AT&T Network Operations Center (NOC) with redundant power, expandable bandwidth, and a high level of physical security. All study staff are required to sign a confidentiality pledge stating that no data will be released to unauthorized personnel. In addition, all electronic data for the study are stored on the ACE3 system (described above).

De-identified project data will be retained for 3 years after the end of the contract. At the end of the 3-year period, data will be destroyed and a Certificate of Data Destruction provided to HUD.

6.5 Privacy Impact Analysis: Related to Information Sharing

Privacy Risk: There is a small risk of data being shared by the contractor with an external agency.

Mitigation: Any sharing of PII is strictly forbidden in the contract terms. There is no Memorandum of Understanding (MOU) in place between HUD and the contractor because there will be no sharing of PII.

Section 7.0 Redress

7.1 What are the procedures that allow individuals to access their information?

In accordance with the Department's Privacy Act Website:

https://portal.hud.gov/hudportal/HUD?src=/program_offices/officeofadministration/privacy_act.

Privacy Act Requests are to be sent to:

Privacy Act Officer
 U.S. Department of Housing and Urban Development
 451 7th Street, SW, Room 10139
 Washington, DC 20410

Privacy Act notice procedures are referenced in the HUD Privacy Act Handbook 1325.1: https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/admh/1325.1. Refer to chapter 3, sections 3-14, 15, and 16 for redress procedures.

Additionally, FOIA notice procedures are on the Department's FOIA website: https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/foia/requests.

Access procedures are documented by the official source systems and the Rapid-Rehousing. Actions should follow the Department's guidelines identified within the SORN. The request should be submitted to the Department's FOIA office, at the address below.

U.S. Department of Housing and Urban Development
Freedom of Information Act Office
451 7th Street, SW, Room 10139
Washington, DC 20410

Facsimile: (202) 619-8365

7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

This is not applicable as the PII information collected will not be made public.

7.3 How does the project notify individuals about the procedures for correcting their information?

As part of the study team's participant data collection efforts, participants receive either a written or verbal request to update their contact information. For those who receive a written request via email, the participant will be asked to submit updated contact information to their contact on the study team.

7.4 Privacy Impact Analysis: Related to Redress

Privacy Risk: This is not applicable, as no personally identifiable information will be made public.

Mitigation: Not applicable.

Section 8.0 Auditing and Accountability

8.1 How does the project ensure that the information is used in accordance with practices stated in this Privacy Impact Assessment?

Abt has a data security plan in place to guide how data are collected, transmitted, and stored at every stage. The Project Director works with HUD, as well as the Abt IRB and IT Security

teams, to ensure that the data security plan is rigorous enough to maintain all study data securely. Access to PII is restricted to those staff members who have a need to access the data to carry out their duties. These staff members are held accountable for ensuring privacy and confidentiality of the data.

There are approximately three staff members who have full access rights to all data in the system and approximately three staff members who have limited access to participant contact data across all sites. There are five additional research staff members who have access to de-identified data. Each data user's permissions are defined based on the user's role on the project. For example, the site interviewers will be able to review data for study participants for only their own specific site. Only a very small number of researchers will have access to the complete, identifiable dataset.

8.2 Describe the privacy training that is provided to users either generally or specifically relevant to the project.

Abt provides all project staff with HIPAA Rules of the Road—Practical Information for Ensuring Compliance; IRB 101 training; General Security Awareness training; and CITI Human Subjects training. All study-team members also undergo project-specific training on maintaining privacy, as well as safe data storage and handling procedures. These trainings are required annually. Compliance with these trainings are tracked and enforced via Abt's Learning Management System. Staff not in compliance with their annual trainings may be placed on administrative leave until they complete the trainings.

8.3 What procedures are in place to determine which users may access the information and how will the project determine who has access?

The project director determines who needs access to the data and what level of access each person needs. They request from the IT security team specific rights to access of the data.

8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within HUD and outside?

This is not applicable, as no information will be shared. There are no sharing agreements, no MOUs, and no access to the system by any internal or external organizations.

Document Endorsement

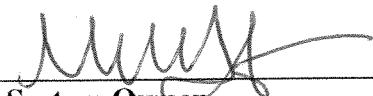
I have carefully assessed the privacy impact assessment for [**Insert Name of IT System and/ or Information Collection Request**]. This document has been completed in accordance with the requirement set forth by the E-Government Act of 2002 and by OMB Memorandum M-03-22, which requires that privacy impact assessments be conducted for all new and/or significantly altered IT Systems and information collection requests.

ENDORSEMENT SECTION

Please check the appropriate statement.

- The document is accepted.**
 The document is accepted pending the changes noted.
 The document is not accepted.

Based on our authority and judgment, the data captured in this document is current and accurate.



System Owner

Mindy Ault, Social Science Analyst
Program Evaluation Division
Office of Policy Development and Research

6/26/17

Date



Program Area Manager

Carol S. Star, Director
Program Evaluation Division
Office of Policy Development and Research

6/26/17

Date



Marcus R. Smallwood,

Acting Chief Privacy Officer
Office of Administration
US Department of Housing and Urban Development

6/16/2017

Date