

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

**INITIAL PRIVACY ASSESSMENT  
(IPA)**

**MANUFACTURED HOME  
CONSTRUCTION AND SAFETY  
STANDARDS ACT REPORTING  
REQUIREMENTS**

**Office of Manufactured Housing  
Programs**

May 14, 2015

## **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:**

**Project Name/Acronym:**

**System Owner/Contact information:**

**Project Leader/Contact Information:**

**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)?

<<ADD ANSWER HERE>>

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

<<ADD ANSWER HERE>>

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

<<ADD ANSWER HERE>>

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

<<ADD ANSWER HERE>>

**QUESTION 2:** What is the Status of system, information collection, or project

- a. If this is a new system, information collection, or project, specify the expected production date.

<<ADD ANSWER HERE>>

- b. If an existing system, information collection, or project, specify the date of production.

<<ADD ANSWER HERE>>

**QUESTION 3:** 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
<input type="checkbox"/>	<input type="checkbox"/>	

Number). Includes PII that may be part of a registration process?

**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)?**

<<ADD ANSWER HERE>>

**QUESTION 4: 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?)

<<ADD ANSWER HERE>>

**QUESTION 5: 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?

<<ADD ANSWER HERE>>

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

<<ADD ANSWER HERE>>

- 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?

<<ADD ANSWER HERE>>

**QUESTION 6: Is there a Certification & Accreditation record for your system?  
(This question does not apply to Information Collection Requests)**

<<ADD ANSWER HERE>>

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

<<ADD ANSWER HERE>>

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?**

**October 22, 1982**

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

**Yes. Installation Instructions were added in 2014 to the reporting requirements.**

**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.**

**The Manufactured Housing Reporting Requirements under OMB Control Number 2502-0253 are being revised as part of a new regulation that will add**

**a streamlined procedure that home manufacturers can utilize, in certain circumstances, to complete construction of manufactured homes on site. This will allow new manufactured homes that are substantially completed in the factory to be completed at the installation site rather than at the plant, without having to first obtain approval from HUD as is the current practice. This regulation will also require that when the work is completed at the site, that it will bring the home into conformance with the Manufactured Home Construction and Safety Standards.**

**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?**

**Yes. See Matrix below for collection and reporting of information under “Industry Practice/Usual and Customary.”**

Information Collection	Number of Respondents	Frequency of Response	Responses per Annum	Burden Hour Per Response	Burden Hours Per Response Industry Practice	Annual Burden Hours	Hourly Cost Per Response	Annual Cost
Consumer Info. Cards	123	460	56,580	0.5		28,290	\$33.00	\$933,570
SAA Reports	37	12	444	0.64		284	33	9,372
State Plan (Update)	8	1	8	40		320	33	10,560
IPIA Reports	15	152	2,280	0.5		1,140	33	37,620
Manufacturers Records	123	460	56,580	0.16		9,053	33	298,742
Consumer Manuals	123	460	56,580	0.1		5,658	33	186,714
Appliance/Utility Labels & Notices	123	460	56,580	0.2		11,316	33	373,428
Smoke Alarms	123	460	56,580	0.1		5,658	33	186,714
Whole House Ventilation Instructions	123	460	56,580	0.01		566	33	18,678
Whole House Ventilation Label	123	460	56,580	0.01		566	33	18,678
Centerline Support Locations	123	300	36,900	0.03		1,107	33	36,531
Data Plate <sup>1, 2</sup>	123	460	56,580	1.0		56,580	33	1,867,140
<b>SUBTOTALS</b>	<b>181</b>		<b>59,304</b>			<b>120,618</b>		<b>3,980,387</b>
<b>Industry Practice/Usual and Customary</b>								
Installation Instructions <sup>1</sup>	80	1	80	1		80	33	2,640
Request for DAPIA Approval	50	1	50	60	3000			
IPIA Written Agreement to Make Inspections	50	1	50	0.2	25			
Work Completed On-site	50	1	50	1.0	50			
Checklists	50	45	2250	0.1	225			
Model List	50	45	2250	0.1	225			
Quality Assurance Manual for On-Site Completion	50	45	2250	0.5	1125			
Manufacturer Inspection Report	50	45	2250	0.5	1125			
Site Completion Instructions	50	45	2250	1.0	2250			
Consumer Notice	50	45	2250	0.25	563			
IPIA Inspection 'Reports	50	45	2250	1.0	2250			
Copy Reports	50	45	2250	0.5	1125			
Maintain Reports	50	45	2250	0.25	563			
Report Serial Numbers	50	45	4200	0.5	2100			
Site Work Certification	50	84	2250	0.2	45			
Quarterly Production Reports	50	4	200	1.0	200			
<b>TOTALS<sup>1</sup></b>	<b>181</b>		<b>86,354</b>		<b>14,871</b>	<b>120,618</b>		<b>3,980,387</b>

**QUESTION 5: Please indicate if any of the following changes to the system or project have occurred: (Mark all boxes that apply.)**

<sup>1</sup>Certificate already required. One-time change; number is now updated

<sup>2</sup>Annual Burden hours now includes an item previously omitted; number is now corrected

<sup>1</sup>Installation instructions are already required and the collection previously approved with the Model Installation Standards. This public burden estimate is for a one-time revision to the instructions.

<sup>1</sup>Total Respondents (37 SAAs, 15 IPIAs, 6 DAPIAs, 123 Manufacturers).



- 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:

The IPA is “not” an official document until all signatures are obtained for this page.

By signing below the Program Office or Support Office attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.

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**SYSTEM OR PROJECT OWNER** **Date**

**Rick Mendlen, Senior Structural Engineer**

**Office of Manufactured Housing Programs**

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**PROGRAM AREA MANAGER** **Date**

**Pamela Beck Danner, Administrator**

**Office of Manufactured Housing Programs**

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**CHIEF PRIVACY OFFICER,** **Date**

**<<INSERT NAME>>**

Office of the Chief Information Officer  
U. S. Department of Housing and Urban Development

