

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

INITIAL PRIVACY ASSESSMENT (IPA)

**Performing Loan Servicing for the Home
Equity Conversion Mortgage (HECM)
OMB Control Number 2502-0611**

Office of Single Family Asset Management

October 11, 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:

Janice Noble, 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:	Performing Loan Servicing for the Home Equity Conversion Mortgage (HECM)		
Program:	<input type="text"/>		
CSAM Name (if applicable):	Click here to enter text.	CSAM Number (if applicable):	Click here to enter text.
Type of Project or Program:	<input type="text"/>	Project or status:	<input type="text"/>
Date first developed:	August 13, 2014	Pilot launch date:	Click here to enter a date.
Date of last IPA update:	January 2, 2014	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	<input type="text"/>	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Venida Brown		
Office:	Single Family Asset Management	Title:	Housing Program Specialist
Phone:	202-402-2456	Email:	Venida.b.brown@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: <input style="width: 100%;" type="text"/>
<p><i>HUD is seeking an extension approval from the Office of Management and Budget (OMB) for information collection number 2502-0611. This information collection is a comprehensive collection of requirements for mortgagees, who service the Home Equity Conversion Mortgage (HECM) and the HECM borrowers who are involved with servicing-related activities. The data and information provided is essential for managing HUD's programs and the FHA Insurance Fund. The respondents are Mortgagees responsible to FHA for the proper servicing of HECMS and reporting to FHA in the HUD's Home Equity Reverse Mortgage Information Technology (HERMIT) system. The information is subject to the Privacy Act and may be made available only to the appropriate Federal, State, and local agencies.</i></p>

<p>2. Does this system employ any of the following technologies? <i>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.</i></p>	<p><input type="checkbox"/> Social Media</p> <p><input type="checkbox"/> Web portal² (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input type="checkbox"/> Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)</p> <p><input checked="" type="checkbox"/> None of these</p>
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<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program does not collect any personally identifiable information³</p> <p><input checked="" type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p> <p><input type="checkbox"/> Other (e.g. business entity)</p>
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² 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.

³ 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.

4. What specific information about individuals is collected, generated or retained?	
Name, social security number, property address and telephone number are required to obtain or retain benefits in the program.	
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?	<input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used: Name, social security number, property address, and telephone number
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?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> 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?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.
4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	Section 165 of the Housing and Community Development Act of 1987, 42 U.S.C. 3543, requires persons applying for assistance under HUD programs to furnish his or her Social Security number (SSN).
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	The SSN is used as a unique identifier.
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer the following question.
4(h) If header or payload data⁴ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

⁴ 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.

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<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p> <p>Click here to enter text.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p> <p>Click here to enter text.</p>
<p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<div style="border: 1px solid black; width: 100px; height: 20px; margin-bottom: 5px;"></div> <p>Please describe applicable information sharing governance in place:</p>
<p>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?</p>	<p><input type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. If yes, please list:</p>
<p>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?</p>	<p><input type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁵</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> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

⁵ 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.

INITIAL PRIVACY ASSESSMENT REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Click here to enter text.
Date submitted to Program Privacy Office:	Click here to enter a date.
Date submitted to HUD Privacy Branch:	Click here to enter a date.
Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Click here to enter text.
Date approved by HUD Privacy Branch:	Click here to enter a date.
IPA Expiration Date:	Click here to enter a date.

DESIGNATION

Privacy Sensitive System:	<input type="text"/> If "no" IPA adjudication is complete.
Category of System:	<input type="text"/> If "other" is selected, please describe: Click here to enter text.
Determination:	<input type="checkbox"/> IPA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information sharing arrangement is required. <input type="checkbox"/> HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input type="checkbox"/> Privacy Impact Assessment (PIA) required. <input type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your program Records Officer.
PIA:	<input type="text"/> If covered by existing PIA, please list: Click here to enter text.

SORN:

If covered by existing SORN, please list: [Click here to enter text.](#)

HUD Privacy Branch Comments:

Please describe rationale for privacy compliance determination above.

[Click here to enter text.](#)