



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

**Initial Privacy Assessment**

**2535-0107 – Public Housing Financial Management  
Template for the Public Housing Financial Assessment  
Subsystem**

**Office of Public and Indian Housing**

May 23, 2017

## INITIAL PRIVACY ASSESSMENT (IPA)

The Initial Privacy Assessment (IPA) is use to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002. The IPA is also used to determine if a System of Records Notice (SORN) is required under the Privacy Act of 1974.

The IPA is an administrative form created by the Privacy Branch to efficiently and effectively identify the use of Personally Identifiable Information (PII) across the Department. The IPA focuses on three areas of inquiry:

- Business data and business processes within each HUD program.
- Potential connections with individuals including the use of PII – any use of social security numbers must be specifically identified.

HUD's program and support offices should ensure that its respective IPA is completed and sent to the Privacy Branch for approval. If SSNs are to be used, the IPA specifically identifies the justification and authority for using SSNs. Upon receipt of the IPA, the Privacy Branch determines the applicability of other privacy compliance requirements including the PIA and SORN. The IPA is complete when the Privacy Branch signs it and sends the final copy back to the identified point of contact.

Please complete this form and send it to the HUD Privacy Branch staff.

Janice Noble  
Acting, Branch Chief  
Privacy Branch  
U.S. Department of Housing and Urban Development

[Privacy@hud.gov](mailto:Privacy@hud.gov)

If a PIA or SORN is required, a copy of the Privacy Impact Assessment and System of Records Notice form is available on the HUD Privacy Branch website, <http://hudatwork.hud.gov/HUD/cio/po/i/privacy>, on HUD@Work or directly from the HUD Privacy Branch via email: [privacy@hud.gov](mailto:privacy@hud.gov) to complete and return.

## INITIAL PRIVACY ASSESSMENT (IPA) SUMMARY INFORMATION

Date Submitted for Review:

Name of System or Project: [2535-0107 – Public Housing Financial Management Template for the Public Housing Financial Assessment Subsystem](#)

System Name in CSAM: [P093 -Financial Assessment Sub-System Public Housing Agency \(FASS-PHA\)](#)

Name of Program Office: [Public and Indian Housing Real Estate Assessment Center](#)

Name of Project Manager or System Owner: [Nicholas Miele](#)

Email for Project Manager or System Owner: [nicholas.x.miele@hud.gov](mailto:nicholas.x.miele@hud.gov)

Phone Number for Project Manager or System Owner: [202.475.8788](#)

Type of Project:

- Information Technology and/or System
- A Notice of Proposed Rule Making or a Final Rule:
- Form or other Information Collection:
- Other: [<Please describe the type of project including paper based Privacy Act system of records.>](#)

## SPECIFIC QUESTIONS

### 1. Describe the project and its purpose:

The Financial Assessment Subsystem – Public Housing (FASS-PH) is a division within the Office of Public and Indian Housing's (PIH's) Real Estate Assessment Center (REAC). PIH-REAC established the FASS-PH application to provide a secure system environment that is Internet-based for program participants to transmit their Generally Accepted Accounting Principles (GAAP) based financial statements to the Department. The FASS-PH application provides for an electronic financial scoring process. The financial condition indicator score is calculated at the project level and provides for an assessment of the project's financial condition. Scores equate to financial stability and/or risk and are used for trending and comparative analysis. The financial condition indicator score is valued at 25 points and based on the three financial condition scoring sub-indicators, quick ratio, months expendable net assets ratio, and debt service coverage ratio.

### 2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: August 1998

Date last updated: February 2016

### 3. From whom do you collect, process, or retain information on: (Please check all that apply)

None of the below are applicable. The information is collected from PHAs.

HUD Employees

Contractors working on behalf of HUD

Tenants and or prospective tenants of Public Housing

The System does not contain any such information.

### 4. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)

No.

Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

**What information about individuals could be collected, generated or retained?**

For each PHA financial submission, the following is collected:

- Auditee Contact Name, Auditee Contact Title, Auditee Contact Telephone No., Auditee Contact Email;
- Certifying Official Name, Certifying Official Title;
- Auditor Name, Auditor Address, Auditor Contact Telephone No., Auditor Contact Email;
- Fee Accountant Name, Fee Accountant Address, Fee Accountant Contact Telephone No. Fee Accountant Contact Email.

**If this project is a 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 the next question.

Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

Yes. What type of data is recorded in the log? (Please choose all that apply.)

Header

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

**6. Does the system connect, receive, or share Personally Identifiable Information with any other HUD systems?**

No.

Yes. Please list the systems:

**Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)? N/A**

**7. Does the system meet all of the following requirements?**

Each submission only has the name, address and contact numbers of the Auditee, Certifying Official, Auditor and Fee Accountant. No personal information or data is collected.

There will be a group of records under the control of an agency that contains a personal identifier (such as a name, date of birth, SSN, Employee Number, fingerprint, etc.) of U.S. citizens and lawful permanent residents;

Contains at least one other item of personal data (such as home address, performance rating, blood type, etc.); and

The data about the subject individual IS retrieved by the name or unique identifier assigned to the individual.

No.

Yes.

If yes is there an existing System of Record Notice?

No.

Yes.

**9. Is there an Authorization to Operate record within OCIO's FISMA tracking system CSAM?**

Unknown

No

Yes. Please indicate the determinations for each of the following:

Confidentiality:       Low  Moderate  High

Integrity:             Low  Moderate  High

Availability:          Low  Moderate  High

**PRIVACY DETERMINATION  
(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)**

**Date reviewed by the HUD Privacy Branch:** <Insert Date.>

**Name of the HUD Privacy Branch Reviewer:** <Please enter name of reviewer.>

**DESIGNATION**

**This is NOT a Privacy Sensitive System** – the system contains no Personally Identifiable Information.

**This IS a Privacy Sensitive System**  
**Category of System**

- IT System
- Legacy System
- HR System
- Rule
- Other: \_\_\_\_\_

**Determination**

- IPA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- PIA is required
  - System covered by existing PIA:
    - New PIA is required
    - PIA update is required
- SORN not required at this time
- SORN is required
  - System covered by existing SORN:
    - New SORN is required

**HUD PRIVACY BRANCH COMMENTS:**

**DOCUMENT ENDORSMENT**

DATE REVIEWED:
PRIVACY REVIEWING OFFICIALS NAME:

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.

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**SYSTEM OWNER**

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**Date**

**PIH Real Estate Assessment Center**

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**PROGRAM AREA MANAGER**

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**Date**

**Nicholas Miele, FASS-PH**

**PIH Real Estate Assessment Center**

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**CHIEF PRIVACY OFFICER**

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**Date**

**<<INSERT NAME/TITLE>>**

**OFFICE OF THE EXECUTIVE SECRETARIAT**