

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

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**Office of Policy Development &  
Research**

Section 811 Project Rental Assistance  
Evaluation Data Files

Privacy Impact Assessment

**June 09, 2017**

## Abstract

This document describes the privacy impact assessment (PIA) for the project Evaluation of the Section 811 Project Rental Assistance (PRA) Program, Phase II, conducted by the Office of Policy Development and Research's (PD&R) Program Evaluation Division (RRE). The project will evaluate the implementation of the Supportive Housing for Persons with Disabilities (Section 811) PRA program, its impact on residents, and the cost-effectiveness of this new housing assistance model for persons with disabilities in six states.

The study will collect the following sensitive information:

- Personally identifiable information (PII) from HUD administrative data (name, address, Social Security Number, date of birth); and data from the Centers for Medicare and Medicaid Services' administrative claims (Social Security Number)
- Health Insurance Portability and Accountability Act (HIPAA)-protected health information (PHI) from Medicaid and Medicare data (dates of medical service, dates of birth, medical record number, and medical information such as diagnoses and healthcare cost data).

## Overview

The purpose of the data collection for the Evaluation of the Section 811 PRA Program, Phase II is to assess the implementation of the Section 811 PRA program and its effectiveness. This is the second of a two-phase evaluation. The evaluation is funded by the Office of Policy Development and Research's Program Evaluation Division (RRE). The authority for the collection of PII and the maintenance of this system can be found at Sec. 501, 502, Housing and Urban Development Act of 1970 (Pub.L.91-609), 12 U.S.C. 1701z-1, 1701z-2.

Phase II of the Section 811 PRA evaluation will rely on both primary and secondary sources of data to inform the overall evaluation as follows:

- (1) Primary data collection will include: (i) interviews with grantee and program partners and stakeholders; and (ii) surveys of Section 811 PRA and Project Rental Assistance Contract (PRAC) residents.
- (2) Secondary/existing datasets will include HUD administrative data, Medicare and Medicaid data from the Centers for Medicare & Medicaid Services (CMS), state Medicaid data from six state Medicaid agencies, and PRA and PRAC program documents.

These data collection efforts will include personal information as a result of: (1) a survey of up to 480 Section 811 PRA and PRAC residents; (2) administrative interviews with grantee and Medicaid Agency staff, with Section 811 property managers and service providers, as well as public housing authorities' (PHAs) staff; (3) HUD's Tenant Rental Assistance Certification System (TRACS) and Public and Indian Housing Information Center (PIC) Inventory Management System data; (4) HUD Integrated Real Estate Management System (iREMS) data; and (5) Medicaid and Medicare data.

Abt Associates (Abt), the contractor for Phase II of the evaluation of the Section 811 PRA program, will receive HUD administrative data with PII/PHI information from HUD through a secure file transfer system. Once a Data Use Agreement (DUA) between HUD, Abt Associates and CMS is executed, the entire file will be sent to CMS ResDAC via their Secure File Transfer Protocol as a finder file for Medicare and Medicaid data for all participants. State level files will be sent to each state individually as a finder file for Medicaid data for participants in that state through Huddle.

Resident surveys will be administered orally by Abt staff who are trained to work with sensitive health data and individuals with disabilities. The survey will be completed electronically and offline through an Access database on an Abt secure laptop. Participants will initially only be linked to responses through their de-identified Abt number and the participant's state. Once the survey is completed, the data will be transferred through Huddle to the ACE 3 server, and will be removed from the laptops. The interviews will be recorded and kept on ACE 3, and will not leave the server.

Administrative interviews will be conducted by Abt Associates researchers with the grantee agency, Medicaid agency, and partner agency staff. For staff administrative interviews, although names will not be reported, position title and site location information will be included, and may be reported,.

To ensure the confidentiality of secondary data, security procedures include: secure transfer protocols for data via Abt's FedRAMP Moderate accredited file transfer service in restricted folders; processing of data on Abt's Analytic Computing Environment in restricted folders, ACE 3, which meets NIST SP 800-53 Revision 4 FISMA Moderate Standards, and utilizes FedRAMP Moderate accredited services from Amazon as infrastructure; and de-identification of files with encryption and separate storage of crosswalks. These processes will be done in accordance with regulations through CMS, HUD, and state agencies that administer state Medicaid programs.

All study staff from Abt Associates have (1) completed study-specific training that incorporates the data security plan, (2) received a copy of the data security plan, and (3) completed general trainings to promote data security and compliance.

All study team members will be made aware of the project-specific data regulations and best practices associated with handling data for the study. All staff will also receive an annual reminder of the terms of the agreement.

All sources of data listed in this section will be used for the draft and final interim reports, evaluation reports, and the final briefing. In all reports, no PII/PHI will be included, and all reported data will be aggregated at either the site or multi-site level. Interview data will not include any PII/PHI.

## 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 PII and the maintenance of this system can be found at Sec. 501, 502, Housing and Urban Development Act of 1970 (Pub.L.91-609), 12 U.S.C. 1701z-1, 1701z-2. The evaluation of the Section 811 PRA program is mandated by the Frank Melville Supportive Housing Investment Act of 2010, which requires HUD to evaluate the implementation of the Section 811 PRA program and its effectiveness. The data will be collected by Abt Associates (Abt) on behalf of HUD in order to fulfill the contractual obligations under contract PSC IDIQ, Contract # HSP233201500069I; Task Order: HHSP23337008T. The contract governs data sharing between Abt and HUD.

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

The intention is to create a SORN and publish a system of records notice. The SORN and the notice are being prepared.

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

A data security plan has been approved by Abt Associates' Institutional Review Board and is included in the Appendix.

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

PD&R has a Records Disposition Schedule 67 for Policy Development and Research Records (2225.6 REV-1, Appendix 67, Records Disposition Schedule 67, PD&R Items Nos. 5 and 6) which provides disposition instructions for Headquarters and Field Office records produced in connection with activities conducted under Title V of the Housing and Urban Development Act of 1970 (P.L. 91-609, 84 Stat. 1784; 12 U.S.C. 1701z-1).

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

Information collection for Phase I of the evaluation of the Section 811 PRA program is currently approved under OMB Control Number 2528-0309 and expires January 31, 2019. The information collection PRA package for Phase II of the evaluation is being submitted as a Substantial Revision of the approved data collection for the first phase. The 60-day notice was published in the Federal Register on April 21, 2017 (Docket No FR-6003-N-04).

## Section 2.0, Characterization of the Information

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

Data will be collected from project rental assistance (PRA) and project rental assistance contract (PRAC) residents, residents with disabilities in the control groups, Section 811 housing agency grantees, and partnering agencies (state Medicaid agencies, property owners, service providers, and public housing authorities (PHAs)).

The project will receive administrative data from HUD on individuals assisted by HUD programs, and on properties that receive HUD funding. The project will also receive Medicare and Medicaid data, including Medicare Parts A and B claims data and Medicaid fee-for-service claims. Abt Associates (Abt) will also obtain Medicaid data, including Medicaid claims/administrative data and managed care encounter data, from six state Medicaid agencies via a memorandum of understanding with Abt.

Personally identifiable information will be collected for PRA and PRAC residents, persons with disabilities in other HUD-assisted housing, and similar non-elderly individuals with disabilities who do not receive housing supports, including:

- Collection of unique identifiers:
  - o Social Security Number
  - o Address
  - o Dates of Birth
  - o Full Name
  - o Phone Number and Address
  
- In addition, HIPAA-protected health information (PHI) will include:
  - o Dates of Medical Service
  - o Dates of Birth
  - o Medical Record Number
  - o Medical Information, such as diagnoses
  - o Healthcare cost data

Identifying information will also be collected from program staff and stakeholders (grantee, Medicaid agency, property owners, service providers, and PHAs), including:

- o Full Name
- o Job Title
- o Contact Information, including addresses, e-mail addresses, and phone numbers

## Section 811 Property Information

Abt will receive the following information on PRA and PRAC properties from the HUD iREMS database:

### From Agency

- 1a. Agency Name
- 1b. PHA Code
- 1c. Program
- 1d. Project Number
- 1e. Building Number
- 1f. Building Entrance Number
- 1g. Unit Number

### From Action

- 2a. Type of Action
- 2b. Effective Date (mm/dd/yyyy) of Action
- 2h. Date (mm/dd/yyyy) of Admission to Program
- 2i. Projected Effective Date (mm/dd/yyyy) of Next Reexamination
- 2m. Special Program

### From Household

- 3a. Member number
- 3b. Last Name
- 3c. First Name
- 3d. MI
- 3e. Date of Birth
- 3f. Age on Effective Date of Action
- 3g. Sex
- 3h. Relation
- 3j. Disability
- 3k. Race
- 3m. Ethnicity
- 3n. Social Security Number
- 3t. Total Number in Household
- 3v. Eligibility Effective Date (mm/dd/yyyy) if Qualified for Continuation of Full Assistance

### From Background at Admission

- 4a. Date (mm/dd/yyyy) Entered Waiting List
- 4b. ZIP Code Before Admission
- 4c. Homeless at Admission?
- 4d. Does family qualify for admission over the very low-income limit?

From Unit to be Occupied on Effective Date of Action

- 5a. Unit Address
- 5b. Is mailing address same as unit address?
- 5c. Family's Mailing Address
- 5d. Number of Bedrooms in Unit
- 5e. Has the PHA identified this unit as an accessible unit?
- 5f. Has the family requested accessibility features?
- 5g. Has the family received requested accessibility features?
- 5h. Date (mm/dd/yyyy) of Last Annual HQS Inspection
- 5j. Year (yyyy) Unit Was Built
- 5k. Structure Type

From Assets

- 6f. Column Total- Cash Value of Assets
- 6g. Column Total- Anticipated Income
- 6h. Passbook Rate
- 6i. Imputed Asset Income
- 6j. Final Asset Income

From Income

- 7a. Family Member Name
- 7b. Income Code
- 7c. Calculation (PHA use)
- 7d. Dollars Per Year
- 7e. Income Exclusions
- 7f. Income After Exclusions
- 7g. Column Total- Income After Exclusions
- 7i. Total Annual Income:

From Expected Income Per Year

- 8a. Total Annual Income
- 8e. Permissible Deductions
- 8f. Medical/Disability Threshold
- 8g. Total Annual Unreimbursed Disability Assistance Expense
- 8h. Maximum Disability Allowance
- 8i. Earnings in 7d Made Possible by Disability Assistance Expense
- 8j. Allowable Disability Assistance Expense
- 8k. Total Annual Unreimbursed Medical Expenses
- 8m. Total Annual Disability Assistance and Medical Expense
- 8n. Medical/Disability Assistance Allowance
- 8p. Elderly/Disability Allowance
- 8q. Number of Dependents
- 8r. Allowance Per Dependent
- 8s. Dependent Allowance
- 8t. Total Annual Unreimbursed Childcare Costs

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- 8x. Total Allowances
- 8y. Adjusted Annual Income

From Total Tenant Payment (TTP)

- 9c. TTP if Based on Annual Income:
- 9f. TTP if Based on Adjusted Annual Income
- 9g. Welfare Rent Per Month
- 9h. Minimum Rent
- 9i. Enhanced Voucher Minimum Rent
- 9j. TTP

From Public Housing and Turnkey III

- 10a. TTP
- 10b. Unit's Flat Rent
- 10c. Income Based Ceiling Rent, if any
- 10d. Lower of TTP or Income Based Ceiling Rent
- 10e. Utility Allowance
- 10f. Tenant Rent
- 10p. Mixed Family TT
- 10r. Utility Allowance
- 10s. Mixed Family Tenant Rent

From Section 8: Project Based Certificates and Vouchers

- 11e. Cost Billed Per Month
- 11k. Contract Rent to Owner
- 11m. Utility Allowance
- 11n. Gross Rent of Unit
- 11q. TTP
- 11r. Total HAP
- 11s. Tenant Rent
- 11t. HAP to Owner
- 11ai. Mixed Family TTP
- 11aj. Utility Allowance
- 11ak. Mixed Family Tenant Rent
- 11an. Prorated HAP to Owner

From Housing Choice Vouchers: Tenant Based Vouchers

- 12a. Number of Bedrooms on Voucher
- 12e. Cost Billed Per Month
- 12j. Payment Standard for the Family
- 12k. Rent to Owner
- 12m. Utility Allowance
- 12p. Gross Rent of Unit
- 12q. Lower of 12j or 12p (Minimum of Payment Standard for the Family or Gross Rent of Unit)
- 12r. TTP
- 12s. Total HAP

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- 12t. Total Family Share
- 12u. HAP to Owner



- 12v. Tenant Rent to Owner
- 12w. Utility Reimbursement to Family
- 12ag. Mixed Family Total Family Contributions
- 12ah. Utility Allowance
- 12ai. Mixed Family Tenant Rent to Owner
- 12aj. Prorated HAP to Owner

From Section 8: Moderate Rehabilitation (Mod Rehab)

- 13a. HAP contract Number
- 13b. Mod Rehab SRO Program for Homeless?
- 13c. Mod Rehab SRO Unit (not homeless program)?
- 13f. Current Base Rent
- 13h. Contract Rent to Owner
- 13i. Utility Allowance
- 13j. TTP
- 13k. Tenant Rent
- 13m. HAP to Owner
- 13v. Mixed Family TTP
- 13w. Utility Allowance
- 13x. Mixed Family Tenant Rent
- 13z. Prorated HAP to Owner

#### **HUD Administrative Tenant-Level Data**

Abt will receive the following tenant-level administrative data from HUD:

#### **50059 TRACs Form – Tenant/Household Data**

From Section B Summary Information

- 1. Project Name
- 2. Subsidy Type
- 4. Property ID
- 5. Project Number
- 6. Contract Number
- 10. Previous Housing Code
- 12. Effective Date
- 13. Anticipated Voucher Date
- 14. Next Recertification Date
- 16. Certification Type
- 21. Unit Number
- 22. Number of Bedrooms
- 23. Building ID
- 25. Previous Unit Number
- 26. Security Deposit
- 27. 236 Basic/BMIR Rent
- 28. Market Rent
- 29. Contract Rent

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- 30. Utility Allowance
- 31. Gross Rent

From Section C Household Information

- 33. Number
- 34. Last Name
- 35. First Name
- 36. Middle Initial
- 37. Relationship
- 38. Sex
- 39. Race
- 40. Ethnicity
- 41. Birth Date
- 42. Special Status
- 43. Student Stat.
- 44. ID Code (SNN)
- 46. Ctzn Code
- 47. Alien Reg. Number
- 48. Age
- 50. Family has Mobility Disability?
- 51. Family has Hearing Disability?
- 52. Family has Visual Disability?
- 53. Number of Family Members
- 54. Number of Non-Family Members
- 55. Number of Dependents
- 56. Number of Eligible Members

From Section D Income Information

- 66. Member Number
- 67. Income Type Code
- 68. Amount
- 69. SSN Benefits Claim Number

From Section E. Asset Information

- 70. Total Employment Income
- 71. Total Pension Income
- 72. Total Public Assistance Income
- 73. Total Other Income
- 74. Total Non-Asset Income
- 81. Total Cash Value of Assets
- 82. Actual Income from Assets
- 85. Asset Income

From Section F. Allowance & Rent Calculations

- 86. Total Annual Income
  - 97. Deduction for Dependents
  - 98. Child Care Expense (work)
  - 99. Child Care Expense (school)
  - 101. Disability Expense
-

- 102. Disability Deduction
- 103. Medical Expense
- 104. Medical Deduction
- 105. Elderly Family Deduction
- 106. Total Deductions
- 107. Adjusted Annual Income
- 108. Total Tenant Payment
- 110. Tenant Rent
- 111. Utility Reimbursement
- 112. Assistance Payment

Additional Requested Fields

- 1. Latitude and Longitude
- 2. Census Tract
- 3. Zip Code
- 4. Mailing Address
- 5. Move in Date

**50058 PIC Form – Family Report**

From Agency

- 1a. Agency Name
- 1b. PHA Code
- 1c. Program
- 1d. Project Number
- 1e. Building Number
- 1f. Building Entrance Number
- 1g. Unit Number

From Action

- 2a. Type of Action
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- 3a. Member Number
  - 3b. Last Name
  - 3c. First Name
  - 3d. MI
  - 3e. Date of Birth
  - 3f. Age on Effective Date of Action
  - 3g. Sex
  - 3h. Relation
  - 3j. Disability
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- 3k. Race
- 3m. Ethnicity
- 3n. Social Security Number
- 3t. Total Number in Household
- 3v. Eligibility Effective Date (mm/dd/yyyy) if Qualified for Continuation of Full Assistance

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From Assets

- 6f. Column Total- Cash Value of Assets
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- 10e. Utility Allowance
- 10f. Tenant Rent
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From Section 8: Project Based Certificates and Vouchers

- 11e. Cost Billed Per Month
- 11k. Contract Rent to Owner
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- 11n. Gross Rent of Unit
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- 12q. Lower of 12j or 12p (Minimum of Payment Standard for the Family or Gross Rent of Unit)
- 12r. TTP
- 12s. Total HAP
- 12t. Total Family Share
- 12u. HAP to Owner
- 12v. Tenant Rent to Owner
- 12w. Utility Reimbursement to Family
- 12ag. Mixed Family Total Family Contributions
- 12ah. Utility Allowance
- 12ai. Mixed Family Tenant Rent to Owner
- 12aj. Prorated HAP to Owner

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- 13h. Contract Rent to Owner
- 13i. Utility Allowance
- 13j. TTP
- 13k. Tenant Rent
- 13m. HAP to Owner
- 13v. Mixed Family TTP
- 13w. Utility Allowance
- 13x. Mixed Family Tenant Rent
- 13z. Prorated HAP to Owner

Additional Requested Fields

1. Latitude and Longitude
2. Census Tract
3. Zip Code

**ResDAC Data Request**

Data Elements from CMS

Inpatient Claims

Outpatient Claims

Skilled Nursing Facility Claims

Hospice Claims  
Home Health Claims  
Carrier Files  
DMERC Claims

Part D Event Files

- Drug Characteristics
- Prescriber Characteristics
- Formulary Files
- Prescription Drug Plan Characteristics Files

Minimum Data Set (MDS) Nursing Home Resident Assessment Files  
Outcome and Assessment Information Set (OASIS) Home Health Assessment Files

Master Beneficiary Summary Files, including:

- Beneficiary Summary Files
- Chronic Conditions
- Cost & Utilization
- Other Chronic or Potentially Disabling Conditions

Historic Medicaid Claims Files

- Personal Summary Records
- Inpatient Records
- Drug Records
- Other Services
- Long Term Care

**811 State Medicaid Data Request**

Data Elements from State Medicaid Claims: FFS Claims and Managed Care Encounter Data  
Please note: Below is a list of Medicaid claims the contractor will be requesting from state Medicaid agencies. Availability of this data will be determined through DUAs between the contractor and state agencies.

Enrollment Files (all fields)  
Demographic Files (all fields)

Inpatient Files

- Patient ID
- All Diagnostic Fields (ICD-9 and/or ICD-10)
- All Procedure Codes (e.g., HICPCS, CPT , CPT modifiers, etc.)
- Hospital Revenue Codes
- Dates of Service (e.g., from\_date and thru\_date)
- Final Paid Amounts
- Provider Zip Code

- Provider Identifiers (NPI/TIN, Provider Type)

#### Outpatient Files

- Patient ID
- All Diagnostic Fields (ICD-9 and/or ICD-10)
- All Procedure Codes (e.g., HICPCS, CPT, CPT modifiers, etc.)
- Facility Revenue Codes
- Dates of Service (e.g., from\_date and thru\_date)
- Final Paid Amounts
- Provider Zip Code
- Provider Identifiers (NPI, TIN, UPIN, Provider Type)

#### DME Files

- Patient ID
- All Diagnostic Fields
- Procedure Codes and Modifiers
- Dates of Service
- Provider ID
- Reimbursement Amount

#### Physician Supplier (Carrier) Files

- Patient ID
- Provider NPI or TIN
- Provider Type

#### PDE Files

- Patient ID
- All Drug Classification Codes (i.e., AHFS, NDC, Drug/Generic Names)
- Fill/Refill Dates/Service Dates
- Fill Number
- Day's Supply/Quantity Dispensed
- Final Paid Amounts (i.e., Plan Covered Paid Amounts)
- Out of Pocket Amounts (i.e., Non-covered Paid Amounts)

#### Hospice Files

- Level of Hospice
- Diagnosis Codes
- Dates of Service
- Provider ID
- Reimbursement Amount



## Long Terms Services and Supports

### Category of Service

- Service Dates
- Provider Type
- Provider ID
- Place of Service
- Procedure Codes
- Units Paid
- Type of Claim

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

Abt Associates will be collecting from other data sources, including the following:

1. Tenant-level HUD administrative tenant data, which includes data extracts from Tenant Rental Certification Systems and the PIH Inventory Management System. This data provides tenant characteristics data on PRA, PRAC, and other assisted housing residents and will be used to determine the analysis samples and provide tenant and unit characteristics for impact and economic studies.
  2. Property-level HUD administrative property data, which are data extracts from Integrated Real Estate Management Systems to provide property and unit characteristics of properties with PRA units and of PRAC properties for the impact and economic analyses.
  3. Property-level financial data, which will include low-income housing tax credit (LIHTC) application and certification data and any similar data from other housing programs that may have funded properties housing PRA and PRAC residents. Such data will be identified based on observed PRA and PRAC properties and acquired from relevant state housing agencies or HUD.
  4. Medicare and historical Medicaid data which includes Medicare claims data, Medicaid Federal Financial System (FFS) claims data, and Medicaid Managed Care encounter data (to the extent available). This provides healthcare utilization outcomes for individuals in analysis samples for impact and cost studies for Section 811 PRA participants dually eligible for Medicare and Medicaid, PRAC participants, and two matched cohorts. The first of these matched cohorts is a group of individuals living in federally subsidized housing and the second is a cohort of Medicaid enrollees who are not in federally subsidized housing.
  5. State Medicaid data, including Medicaid claims/administrative data and managed care encounter data from the six study states for the four cohorts of individuals as described above. This data provides additional healthcare utilization outcomes for individuals in analysis samples for impact and cost studies.
  6. PRA program documents including PRA program grant applications, partnership agreements, and PRA program policies and procedure documents. This will provide background and procedural information on PRA program for the implementation analysis, including identification of target population, outreach and referral methods, and property selection methods. Program documents will also determine program elements and associated valuations for the economic analysis.
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7. Section 811 PRA quarterly reports are PRA program and budget quarterly reports submitted to HUD 30 days after each quarter end throughout the 5-year grant period. Quarterly report data will identify the status of PRA program implementation regarding PRA contracts, units, applicants, referrals, and residents.
8. PRAC program documents, including grantee applications, supportive plans, and audited expense statements, will be used to determine program ingredients and associated valuations for the economic analysis.

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

Abt Associates may use publicly available data on neighborhood characteristics and demographics from various sources, including the American Community Survey and others in order to supplement analysis of neighborhood quality, including neighborhood accessibility via transportation, race, income, and air quality. No public or commercial data is collected on the individual.

2.4 Discuss how accuracy of the data is ensured.

All data obtained from other administrative agencies such as CMS' ResDAC or State Medicaid Agencies are checked for accuracy to make sure the data was matched appropriately. The returned information will be cross checked to ensure it syncs with our expectations. For example, a single Social Security number (SSN) sent to CMS may result in multiple entries for the same SSN, and we may need to determine whether any/some/all of the returned identifiers, such as gender and data of birth, match up with what we have on file.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

**Privacy Risk:** The project faces risk of over-collection of data and of inaccurate data. In terms of over-collection of data, the project may request and receive more Medicare and Medicaid information than is necessary through requests to ResDAC and state Medicaid agencies. Data received through ResDAC, state Medicaid agencies, and HUD also risk being inaccurate, as does the survey results received through interviews with residents with disabilities, who might have difficulty giving accurate and complete answers. Neither of these problems will impact or harm the individuals whose information is inaccurate, but the accuracy is still important for the overall success of the evaluation.

**Mitigation:** The results of this evaluation will be used for administrative purposes only. The results will not affect the included individuals in this study. To mitigate over-collection of data, ResDAC requires the project to justify each data element it requests, and specify how each requested data element will be used in the evaluation. While the application process varies across the six states, each Medicaid agency requires a similar justification for each requested data element.

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To ensure data accuracy in administrative data, Abt will conduct extensive checks, cleaning, and analysis. Abt has extensive experience working with HUD and CMS administrative data and verifying these data for accuracy and completeness. Prior to the

start of each survey, Abt staff will conduct a brief cognitive screen to assess respondents' ability to answer the types of questions asked in the survey. Training of survey administrators will include information on how to administer surveys to individuals with cognitive impairments, and survey administrators will be directed to paraphrase questions whenever necessary, ask follow-up or verifying questions, or mark responses as unclear when they are unable to verify the accuracy of a response. At the end of the survey, administrators will also be asked how accurate they believed the answers to be.

## Section 3.0, Uses of the Information

### 3.1 Describe how and why the project uses the information.

The project collects Social Security numbers, states, genders, dates of birth, program participation flags, and full names because that information provides the best matching capabilities to obtain Medicare and Medicaid data, such as diagnoses, disability types, health care utilization, and health care costs of Section 811 PRA participants as well as participants in other housing situations. While Social Security numbers and dates of birth are anticipated to be the main sources of matching, it is possible that the other sources may be necessary for a more accurate match.

The health and housing information from HUD data, Medicare and Medicaid data, and resident surveys will be used only for research and evaluation purposes. The data will be used to construct the analysis sample and to estimate differences in outcomes between Section 811 PRA residents and individuals in the comparison groups. The analysis sample will include four groups. Individuals living in Section 811 PRA units represent the primary “treatment” group of interest. Three groups provide distinct counterfactual comparison groups. The first is composed of individuals in Section 811 PRAC units in the same geographic areas selected to be similar to PRA residents in terms of diagnoses, health care utilization, disability types, and demographic characteristics, such as age and gender. The second is composed of individuals with disabilities in other HUD-assisted housing (Housing Choice Vouchers, public housing, multifamily assisted housing) in the same geographic areas, also selected to be similar to PRA residents. The third comparison group is a business-as-usual group that includes similar non-elderly disabled individuals not assisted by HUD programs and who may be in any other housing situation (living with family, homeless, in market-rate housing, or in institutional settings).

The project will use a multi-stage data matching approach along with propensity score reweighting combined with regression models (adjusting for prior medical diagnosis and disability type, at a minimum) to estimate differences in outcomes between PRA residents and individuals in three comparison groups.

### 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.

This information collection, known as the Evaluation of the Section 811 PRA Program, Phase II, will produce a dataset to be used to study the Section 811 PRA program and evaluate its impacts on participants and its cost-effectiveness. Data collected for this study will be used only for research and evaluation purposes. The data will never be used for any other purpose. The study will produce aggregate results and will not affect individuals, existing records, or new records. The data will enable HUD to assess how 811 PRA residents fare relative to similar individuals in terms of quality of life, housing and neighborhood characteristics, housing tenure, health and service utilization patterns, and whether the 811 PRA program is cost-effective.

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

Abt Associates will act as the sole custodian of the dataset for this study. This dataset will not be shared with other departments at HUD.

### 3.4 Privacy Impact Analysis: Related to the Uses of Information

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 and safe data storage and handling procedures. All study team members sign a non-disclosure agreement.

**Privacy Risk:** The privacy risk associated with the uses of information are possible misuse and inappropriate dissemination of PII records.

**Mitigation:** To mitigate risks, this information will only be used for research purposes and for no other use. All study staff from Abt Associates have (1) completed study-specific training that incorporates the data security plan, (2) received a copy of the data security plan, and (3) completed general trainings to promote data security and compliance. Management of trainings is handled within each organization that is part of the study and occurs annually or biannually.

All study team members will be made aware of the project-specific data regulations and best practices associated with handling data for the study. These practices are incorporated in the study protocol and will be detailed in training plans for interviewers, support staff, and data analytic staff. All staff who will have access to the data containing PII or PHI information will sign a confidentiality agreement pursuant to the requirements of all data use agreements, which will be attached to the data security plan. All staff will also receive an annual reminder of the terms of the agreement.

Abt will guarantee this level of restricted access by only using secure transfer mechanisms, such as Huddle, Abt's FedRAMP Moderate accredited file transfer service for moving data in and out of the system, or another secure file transfer system (SFTP) of the transferring agency's choice. Abt will also only access the data through its restricted access folder on the Analytic Computing Environment, ACE 3, which meets NIST SP 800-53, Revision 4 FISMA Moderate Standards, and utilizes FedRAMP Moderate accredited services from Amazon as infrastructure.

## 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.

For the administrative interviews, Abt Associates (Abt) will receive an introduction from HUD to grantees, and will reach out to set up interviews with grantees, their program partners, and other major stakeholders (property owners, public housing authorities, and service providers). The respondents will be read an oral consent script at the start of the interview.

For the Section 811 resident survey, Abt will send the residents a letter and let them know when interviewers will be on-site to conduct surveys. The letter will include a telephone number that residents can call to learn more about the survey and indicate their interest in participating. At the beginning of the survey, residents will be read a consent script and given a consent document to sign to make them aware of how their information will be used. Prior to the collection of information, PD&R will draft a SORN and publish a system of records notice.

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 for residents, property owners, service providers, and Public Housing Authorities, and grantee partner agencies is 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 voluntary. Those who consent to participate in data collections can opt out of answering a particular question or stop the interview at any time, without penalty. There are no risks that individuals participating in the study will lose benefits they might otherwise receive. Participants will be notified of all of this information in the consent script, and will be given a name and contact information if they have any questions about the study.

As grantees, the housing agencies are required to participate in the evaluation as a condition of their grant funding. However, staff from these agencies may opt out of answering any specific questions without penalty. Partner agencies are not required to participate in the evaluation, and have the option to decline the interview, and also may opt out of answering specific questions should they choose to complete the interview.

4.3 Privacy Impact Analysis: Related to Notice

**Privacy Risk:** There are no privacy risks related to the Notice because the notice about information collection has been made public through public notices for the first phase of the information collection effort (60-Day Notice, Federal Register, Vol. 80, No 126, 7/1/2015, FR-5837-N-03; 30-Day Notice, Federal Register, Vol. 80, No 192, 10/5/2015, FR-5831-N-45) and though notices for a revision of the information collection effort for the second phase of the evaluation (60-Day Notice, Federal Register, Vol. 82 FR 18768, 4/21/2017, FR-6003-N-04; 30-Day Notice to be published shortly). In addition, prior to the collection of information, PD&R will draft a SORN and publish a system of records notice.

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All individuals interviewed or surveyed for administrative interviews or resident surveys will consent to participation unless participation is required because of their role as Section 811 grantees. All individuals interviewed or surveyed will be given sufficient notice about the data collection. The information collected will not affect individuals because the collection will not be used for administrative purposes.

**Mitigation:** *N/A*

## Section 5.0 Data Retention by the project

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

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 records that do not need to be retained and will destroy the remainder of the files after the contract ends as is required in the contract. The retention and disposal procedures are in keeping with HUD's records management policies as described in 44 USC 3101 and 44 USC 3303 and with HUD's Records Disposition Schedule 67 for PD&R, Item 6

(<https://portal.hud.gov/hudportal/documents/huddoc?id=22256x67ADMH.pdf>). Abt Associates will submit all de-identified data over to HUD at the end of the contract, with the exception of the ResDAC and Medicaid data, which will not be included as per memorandum of understanding with these agencies.

### 5.2 Privacy Impact Analysis: Related to Retention

**Privacy Risk:** During the transfer or storage of data, privacy data could be compromised or stolen.

**Mitigation:** Security procedures to ensure the confidentiality of secondary data include: secure transfer protocols for data via Abt's FedRAMP Moderate accredited file transfer service in restricted folders; processing of data on Abt's Analytic Computing Environment in restricted folders, ACE 3, which meets NIST SP 800-53 Revision 4 FISMA Moderate Standards, and utilizes FedRAMP Moderate accredited services from Amazon as infrastructure; and de-identification of files with encryption and separate storage of crosswalks. These processes will be done in accordance with regulations through CMS, HUD, and state agencies that administer state Medicaid programs.

All study staff from Abt Associates have 1) completed study-specific training that incorporates the data security plan, 2) received a copy of the data security plan, and 3) completed general trainings to promote data security and compliance.

All study team members will be made aware of the project-specific data regulations and best practices associated with handling data for the study. All staff will also receive an annual reminder of the terms of the agreement.



## 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.

Abt Associates will collect data on behalf of HUD under contract PSC IDIQ Contract # HSP233201500069I; Task Order: HHSP23337008T.

HUD will enter into a memorandum of understanding (MOU) with the Centers for Medicare and Medicaid Services to collect information on study participants. Abt Associates will enter into MOUs with state Medicaid agencies to collect additional medical information on study participants. Only information necessary for matching participants to these other datasets (SSN, full name, state, date of birth and gender, as well as an Abt ID) will be shared to the other agencies. Agencies will then be asked to match data they have on the individual to this data and return it to Abt.

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

The external information sharing noted in 6.1 will not be initiated until a SORN is published and approved.

6.3 Does the project place limitations on re-dissemination?

Only Abt staff participating in the study and listed in the Data Security Plan will have access to all data. Abt will be sharing a finder file received from HUD that contains PII with ResDAC and State Medicaid Agencies in order to obtain and match health data to housing data, but HUD will never receive any individual-level ResDAC or State Medicaid Agency data. HUD also does not have a duty to share information.

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

Abt will retain an account on behalf of HUD on what records will be shared with which other organizations. This will be kept in an encrypted data file on the Abt server in the same location as the PII that has been encrypted and stored.

For the finder file Abt shares with ResDAC and State Medicaid Agencies, the Data Use Agreements will define which parties can access the finder file. For all data received and stored by Abt, the Abt Project Director determines who needs access to the data and what level of access each person needs. The Project Director must request specific rights from Abt Associates IT Security Team for each person. All data is stored on a remote server with both encryption and two-factor authentication to ensure the security of data.

The contract between HUD and Abt Associates governs data management, security, disclosure, and dissemination. The contract requires each Abt employee to execute a non-disclosure agreement (NDA) with HUD prior to being provided access to any controlled unclassified information (CUI), including PII. NDAs prohibit the disclosure, publication, or

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release of CUI without express authorization by HUD and require immediate notification to superiors and to HUD if unauthorized CUI disclosure occurs.

Abt has a data security plan in place to guide how data are collected, how it is transmitted, how it is stored at every stage. The Project Director and Database Manager worked with HUD and the Abt IRB and Abt IT Security teams to ensure that the data security plan is rigorous enough to maintain all study data securely.

All study staff from Abt Associates have 1) completed study-specific training that incorporates the data security plan, 2) received a copy of the data security plan, and 3) completed general trainings to promote data security and compliance.

All study team members will be made aware of the project-specific data regulations and best practices associated with handling data for the study. All staff will also receive an annual reminder of the terms of the agreement.

The DUA with ResDAC has provisions to ensure that HUD, and Abt Associates as the custodian of the data, will not to disclose direct findings, listings, or information derived from the file(s) obtained from CMS if such findings, listings, or information can, by themselves or in combination with other data, be used to deduce an individual's identity. The DUAs with six state Medicaid agencies will have similar provisions about protecting the disclosure and dissemination of information.

This data collection effort will result in one interim report, one final report, and a final briefing, all of which will be reviewed and approved by HUD before any publication. No PII/PHI will be included in any written reports and all reported data will be aggregated at either the site or multi-site level. Interview data will not include any PII or PHI.

## 6.5 Privacy Impact Analysis: Related to Information Sharing

**Privacy Risk:** There is a risk of improperly disclosing PII outside of the department.

**Mitigation:** This risk is mitigated by limiting the staff allowed to handle the data, requiring staff with access to the data to execute NDAs and complete data security and compliance training, encrypting identifying information as quickly as possible, and ensuring that all PII information is physically and technologically protected to meet HUD and CMS standards at all time, reporting only aggregated data that does not disclose PII or PHI, and submitting any report, document, presentation to HUD for review and approval before publication.

## Section 7.0 Redress

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

FOIA notice are on the Department's FOIA website:

[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/foia/requests](https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/foia/requests)

Additional access procedures are documented by the official source systems and LRS SORN. Actions should follow the Department's guidelines identified within each SORN. The request should be submitted to the Department's FOIA office address below.

U.S. Department of Housing and Urban Development  
Freedom of Information Act Office  
451 7th Street, SW, Room 10139  
Washington, DC 20410-3000  
Facsimile: (202) 619-8365

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

The redress/access procedures for correcting inaccurate or erroneous information will be handled in the same manner as described by section 7.1.

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

Data collection will not be used for administrative purposes, therefore correction of inaccurate or erroneous information would not benefit the individual. Data will be used for research and evaluation only.

7.4 Privacy Impact Analysis: Related to Redress

**Privacy Risk:** there is no privacy risk related to redress because data collection will only be used for administrative purposes, and thus access and correction of inaccurate or erroneous information would not benefit the individual. Data will be used for research and evaluation only.

**Mitigation:** *N/A*

## Section 8.0 Auditing and Accountability

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

Abt has a data security plan in place to guide how data are collected, how it is transmitted, how it is stored at every stage. The Project Director and Database Manager worked with HUD and the Abt IRB and Abt IT Security teams to ensure that the data security plan is rigorous enough to maintain all study data securely. Only a very small number of researchers will have access to the complete identifiable dataset. Access to personally identifiable information is restricted to those staff that has 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 5 staff members that have full access rights to all data in the system. There are 10 survey staff members that have limited access to resident contact data across all sites. Each data user's permissions are defined based on the user's role on the project.

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; CITI Human Subjects Training. All study team members also undergo project specific training on maintaining privacy, and 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?

For the finder file Abt shares with ResDAC and State Medicaid Agencies, the Data Use Agreements will define which parties can access the finder file. For all data received and stored by Abt, the Abt Project Director determines who needs access to the data and what level of access each person needs. The Project Director must request specific rights from Abt Associates IT Security Team for each person. All data is stored on a remote server with both encryption and two-factor authentication to ensure the security of 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?

All data use agreements or MOUs are reviewed by HUD's COR and division director and by the contractor's project director, IRB, IT Security team, and contract offices.

**Document Endorsement**


I have carefully assessed the Privacy Impact Assessment (PIA) 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 OMB Memorandum 03-22 which requires that "Privacy Impact Assessments" (PIAs) 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.



\_\_\_\_\_  
Teresa Souza  
Policy & Development Research

6/22/2017

\_\_\_\_\_  
**Date**



\_\_\_\_\_  
Marcus Smallwood  
Chief Privacy Officer  
Office of Administration  
U. S. Department of Housing and Urban Development

6/26/2017

\_\_\_\_\_  
**Date**

# **Appendix A: Section 811 PRA Evaluation Phase II Data Security Plan**

Submitted as a separate document.