

Privacy and Civil Liberties Impact Assessment (PCLIA)



Privacy and Civil Liberties Impact Assessment
for the

Family Self-Sufficiency (FSS) Program Demonstration

<< Publication Date >>

Reviewing Official
Helen Goff Foster
Chief Privacy Officer
Department of Housing and Urban Development

[THIS PAGE MUST BE REMOVED PRIOR TO PUBLICATION]

Certifying Official

Helen Goff Foster
Chief Privacy Officer
Department of Housing and Urban Development
(202) 402-5581

System Owner

Regina C. Gray
Social Science Analyst and Contracting Officer's Technical Representative
Affordable Housing Research and Technology Division
Office of Policy Development and Research
Department of Housing and Urban Development
202-402-2876

OCIO/Information Security Contact Consulted in Drafting the PCLIA

Tracy Bigesby
Office of the Chief Information Officer, HUD
Chief Information Security Office
202-619-9057, ext. 3616

Paperwork Reduction Act Contact Consulted in Drafting the PCLIA

<< Name >>
<< Program/Agency/Office>>
<< Departmental Office>>
<< Contact Phone>>

Records Management Contact Consulted in Drafting the PCLIA

Marcus Smallwood
Office of Administration, HUD
Director, Executive Secretariat Division
202-402-5581

Section 508 Coordinator Contact Consulted in Drafting the PCLIA

Peter J. Reed
Office of the Chief Information Officer, HUD
Director, Customer Services Division
202-402-6391

Other Department Reviewer:

Ronald Hill
Office of Policy Development and Research, HUD
Program Evaluation Division
202-402-7073

Table of Contents

Section 1: Introduction.....	4
Section 2: Definitions	5
Section 3: System Overview	9
Section 4: Information Collection.....	9
Section 5: Maintenance, use, and sharing of the information.....	20
Section 6: Compliance with federal information management requirements.....	32
Section 7: Redress.....	36

Section 1: Introduction

It is the policy of the Department of Housing and Urban Development (“HUD” or “Department”) to conduct a Privacy Impact Assessment (“PCLIA”) when [personally identifiable information](#) (“PII”) is maintained in a system or by a project. PCLIA’s are required for all systems and projects that collect, maintain, or disseminate [PII](#), regardless of the way the information is retrieved.

This assessment is being completed pursuant to Section 208 of the [E-Government Act of 2002](#) (“E-Gov Act”), 44 U.S.C. § 3501, Office of the Management and Budget (“OMB”) Memorandum 03-22, “[OMB Guidance for Implementing the Privacy Provisions of the E-Government Act of 2002](#),” and “[Privacy Impact Assessment \(PCLIA\)](#),” which requires HUD to conduct a PCLIA before:

1. Developing or procuring [information technology](#) (“IT”) systems or projects that collect, maintain or disseminate [PII](#) from or about members of the public, or
2. Initiating a new collection of information that: a) will be collected, maintained, or disseminated using [IT](#); and b) includes any [PII](#) permitting the physical or online contacting of a specific individual, if identical questions have been posed to, or identical reporting requirements imposed on, 10 or more persons. Agencies, instrumentalities, or employees of the federal government are not included.

This PCLIA provides the following information regarding the system or project:

- (1) an overview of its purpose and functions;
- (2) a description of the information collected;
- (3) a description of how the information is maintained, used, and shared;
- (4) an assessment of whether the system or project is in compliance with federal requirements that support information privacy; and
- (5) an overview of the redress/complaint procedures available to individuals who may be affected by the use or sharing of information by the system or project.

This is the first time a PCLIA is being completed for the Family Self-Sufficiency (FSS) Program Demonstration.

Section 2: Definitions

Agency – means any entity that falls within the definition of the term “executive agency” as defined in 31 U.S.C. § 102.

Certifying Official – The Chief Privacy Officer who reviews and approves all PCLIA as part of her/his duties as a direct report to Housing and Urban Development Senior Agency Official for Privacy.

Collect (including “collection”) – means the retrieval, receipt, gathering, or acquisition of any PII and its storage or presence in a HUD system. This term should be given its broadest possible meaning.

Contractors and service providers – are private companies that provide goods or services under a contract with the Department of Housing and Urban Development or one of its bureaus. This includes, but is not limited to, information providers, information processors, and other organizations providing information system development, information technology services, and other outsourced applications.

Data mining – means a program involving pattern-based queries, searches, or other analyses of 1 or more electronic databases, where – (a) a department or agency of the federal government, or a non-federal entity acting on behalf of the federal government, is conducting the queries, searches, or other analyses to discover or locate a predictive pattern or anomaly indicative of terrorist or criminal activity on the part of any individual or individuals; (b) the queries, searches, or other analyses are not subject-based and do not use personal identifiers of a specific individual, or inputs associated with a specific individual or group of individuals, to retrieve information from the database or databases; and (c) the purpose of the queries, searches, or other analyses is not solely – (i) the detection of fraud, waste, or abuse in a government agency or program; or (ii) the security of a government computer system.

Disclosure – When it is clear from its usage that the term “disclosure” refers to records provided to the public in response to a request under the Freedom of Information Act (5 U.S.C. § 552, “FOIA”) or the Privacy Act (5 U.S.C. § 552a), its application should be limited in that manner. Otherwise, the term should be interpreted as synonymous with the terms “sharing” and “dissemination” as defined in this manual.

Dissemination – as used in this manual, is synonymous with the terms “sharing” and “disclosure” (unless it is clear from the context that the use of the term “disclosure” refers to a FOIA/Privacy Act disclosure).

E-Government – means the use of digital technologies to transform government operations to improve effectiveness, efficiency, and service delivery.

Federal information system – means a discrete set of information resources organized for the collection, processing, maintenance, transmission, and dissemination of information owned or under the control of a federal agency, whether automated or manual.

Final Rule – After the NPRM comment period closes, the agency reviews and analyzes the comments received (if any). The agency has the option to proceed with the rulemaking as proposed, issue a new or modified proposal, or withdraw the proposal before reaching its final decision. The agency can also revise the supporting analyses contained in the NPRM (e.g., to address a concern raised by a member of the public in response to the NPRM).

Government information – means information created, collected, used, maintained, processed, disseminated, or disposed of by or for the federal government.

Individual – means a citizen of the United States or an alien lawfully admitted for permanent residence. If a question does not specifically inquire about or an issue does not clearly involve a [Privacy Act system of records](#), the term should be given its common, everyday meaning. In certain contexts, the term individual may also include citizens of other countries who are covered by the terms of an international or other agreement that involves information stored in the system or used by the project.

Information – means any representation of knowledge such as facts, data, or opinions in any medium or form, regardless of its physical form or characteristics. This term should be given the broadest possible meaning. This term includes, but is not limit to, information contained in a [Privacy Act system of records](#).

Information technology (IT) – means any equipment or interconnected system or subsystem of equipment, used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency, if the equipment is used by the executive agency directly or is used by a contractor under a contract with the executive agency that requires the use: (i) of that equipment; or (ii) of that equipment to a significant extent in the performance of a service or the furnishing of a product. It includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance), peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including support services), and related resources; but does not include any equipment acquired by a federal contractor incidental to a federal contract. Clinger-Cohen Act of 1996, 40 U.S.C. § 11101(6).

Major Information system – embraces “large” and “sensitive” information systems and means “a system or project that requires special management attention because of its importance to an agency mission; its high development, operating, or maintenance costs; or its significant role in the administration of agency programs, finances, property, or other resources.” OMB Circular A-130, § 6.u. This definition includes all systems that contain [PII](#) and are rated as “MODERATE or HIGH impact” under Federal Information Processing Standard 199.

National Security systems – a telecommunications or information system operated by the federal government, the function, operation or use of which involves: (1) intelligence activities, (2) cryptologic activities related to national security, (3) command and control of military forces, (4) equipment that is an integral part of a weapon or weapons systems, or (5) systems critical to

the direct fulfillment of military or intelligence missions, but does not include systems used for routine administrative and business applications, such as payroll, finance, logistics, and personnel management. Clinger-Cohen Act of 1996, 40 U.S.C. § 11103.

Notice of Proposed Rule Making (NPRM) – the Privacy Act (Section (J) and (k)) allow agencies to use the rulemaking process to exempt particular systems of records from some of the requirements in the Act. This process is often referred to as “notice-and-comment rulemaking.” The agency publishes an NPRM to notify the public that the agency is proposing a rule and provides an opportunity for the public to comment on the proposal before the agency can issue a final rule.

Personally Identifiable Information (PII) –any information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.

Privacy and Civil Liberties Impact Assessment (PCLIA) – a PCLIA is:

- (1) a *process* conducted to: (a) identify privacy and civil liberties risks in systems, programs, and other activities that maintain [PII](#); (b) ensure that information systems, programs, and other activities comply with legal, regulatory, and policy requirements; (c) analyze the privacy and civil liberties risks identified; (d) identify remedies, protections, and alternative or additional privacy controls necessary to mitigate those risks; and (e) provide notice to the public of privacy and civil liberties protection practices.
- (2) a *document* that catalogues the outcome of that privacy and civil liberties risk assessment process.

Protected Information – as the term is used in this PCLIA, has the same definition given to that term in TD 25-10, Section 4.

Privacy Act Record – any item, collection, or grouping of information about an individual that is maintained by an agency, including, but not limited to, the individual’s education, financial transactions, medical history, and criminal or employment history and that contains the individual’s name, or the identifying number, symbol, or other identifying particular assigned to the individual, such as a finger or voice print or a photograph. 5 U.S.C. § 552a (a)(4).

Routine Use – with respect to the disclosure of a record outside of HUD (i.e., external sharing), the sharing of such record for a purpose which is compatible with the purpose for which it was collected 5 U.S.C. § 552a(a)(7).

Sharing – any HUD initiated distribution of information to government employees or agency contractors or grantees, including intra- or inter-agency transfers or exchanges of HUD information, regardless of whether it is covered by the Privacy Act. It does not include responses to requests for agency records under FOIA or the Privacy Act. It is synonymous with the term “dissemination” as used in this assessment. It is also synonymous with the term “disclosure” as used in this assessment unless it is clear from the context in which the term is used that it refers

to disclosure to the public in response to a request for agency records under FOIA or the Privacy Act.

System – as the term used in this manual, includes both federal information systems and information technology.

System of Records – a group of any records under the control of HUD from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual. 5 U.S.C. § 552a (a)(5).

System of Records Notice (SORN) – Each agency that maintains a system of records shall publish in the *Federal Register* upon establishment or revision a notice of the existence and character of the system of records, which notice shall include: (A) the name and location of the system; (B) the categories of individuals on whom records are maintained in the system; (C) the categories of records maintained in the system; (D) each routine use of the records contained in the system, including the categories of users and the purpose of such use; (E) the policies and practices of the agency regarding storage, retrievability, access controls, retention, and disposal of the records; (F) the title and business address of the agency official who is responsible for the system of records; (G) the agency procedures whereby an individual can be notified at her/his request if the system of records contains a record pertaining to him; (H) the agency procedures whereby an individual can be notified at her/his request how she/he can gain access to any record pertaining to him contained in the system of records, and how she/he can contest its content; and (I) the categories of sources of records in the system. 5 U.S.C. § 552a (e)(4).

System Owner – Official responsible for the overall procurement, development, integration, modification, or operation and maintenance of a system.

Section 3: System Overview

Section 3.1: System/Project Description and Purpose

In March 2012, HUD awarded the National Family Self-Sufficiency Evaluation to MDRC. The primary goal of the Family Self-Sufficiency evaluation is to increase our knowledge about the effectiveness of FSS, which is aimed at helping housing-assisted populations secure and maintain employment and gain independence from public support programs. The implementation research will allow the research team to learn about the delivery of FSS services and how different service delivery practices may influence participation and program effectiveness. Information collected from staff will include data about staffing, program policies and approaches, case management practices, the goal-setting process, Program Coordinating Committees' involvement in service delivery, and program costs, among other topics. Information collected from participants will include motivation for joining FSS, selection of goals and progress toward goals, views about the escrow component, relationship with case managers, and reflections on their experience with the program in general. This type of information is only available through field research visits and interviews with staff and participants and cannot be obtained through administrative records or surveys. The MDRC research team has prepared an information collection to meet the contractual requirements that includes a survey of FSS Supervisors, FSS Case Managers, FSS Coordinators and site visits to active FSS participants where they will be interviewed to understand how the program is working for them.

Estimated Number of Individuals Whose Personally Identifiable Information is Maintained in the System or by the Project		
<input type="checkbox"/> 0 – 999	<input checked="" type="checkbox"/> 1000 – 9,999	<input type="checkbox"/> 10,000 – 99,999
<input type="checkbox"/> 100,000 – 499,999	<input type="checkbox"/> 500,000 – 999,999	<input type="checkbox"/> 1,000,000+

Section 3.2: Authority to Collect

The authorities for operating this system or performing this project are:

12 U.S.C. §1701z-1 established PD&R and its authority to conduct research. 12 U.S.C. 1701z-2(g) Information and data, gives PD&R the authority to request personal information from people. HUD promises confidentiality as stated in the Privacy Act of 1974 (5 U.S.C. 552a), Records Maintained on Individuals, and obtains consent from individual study participants as part of the enrollment in the study. The findings from the study will be publicly reported only at the aggregate level; neither individual service coordinators nor focus group participants will be identified in the study reports.

Section 4: Information Collection

Section 4.1: Relevant and Necessary

The [Privacy Act](#) requires “each agency that maintains a [system of records](#) [to] maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be fulfilled by statute or by executive order of the President.” 5 U.S.C. § 552a (e)(1). It allows federal agencies to exempt records from certain requirements (including the relevant and necessary requirement) under certain conditions U.S.C. §552a (k). The proposed exemption must be described in a [Notice of Proposed Rulemaking](#) (“NPRM”). In the context of the Privacy Act, the purpose of the NPRM is to give the public notice of a Privacy Act exemption claimed for a system of records and solicit public opinion on the proposed exemption. After addressing any public concerns raised in response to the NPRM, the agency must issue a [Final Rule](#). It is possible for some, but not all, of the [records](#) maintained in the system or by the project to be exempted from the [Privacy Act](#) through the [NPRM/Final Rule](#) process.

[Section 4.1\(a\)](#) Please check all of the following that are true:

1. None of the [PII](#) maintained in the system or by the project is part of a [Privacy Act system of records](#);
2. All of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and none of it is exempt from the [Privacy Act](#) relevant and necessary requirement;
3. All of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and all of it is exempt from the [Privacy Act](#) relevant and necessary requirement;
4. Some, but not all, of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and the records to which the [Privacy Act](#) applies are exempt from the relevant and necessary requirement; and
5. Some, but not all, of the [PII](#) maintained in the system or by the project is part of a [system of records](#) and none of the records to which the [Privacy Act](#) applies are exempt from the relevant and necessary requirement. Section 502 (g) of the Housing and Urban Development Act of 1970 (Public Law 91609) (12 U.S.C. 1701z-1; 1701z-2(d) and (g)).

[Section 4.1\(b\)](#) Yes No N/A With respect to [PII](#) maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirement, was an assessment conducted prior to collection (e.g., during [Paperwork Reduction Act](#) analysis) to determine which [PII](#) types (see [Section 4.2](#) below) were relevant and necessary to meet the system's or project's mission requirements?

[Section 4.1\(c\)](#) Yes No N/A With respect to [PII](#) currently maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirement, is the [PII](#) limited to only that which is relevant and necessary to meet the system's or project's mission requirements?

Section 4.1(d) Yes No N/A With respect to [PII](#) maintained in the system or by the project that is subject to the [Privacy Act's](#) relevant and necessary requirement, is there a process to continuously reevaluate and ensure that the [PII](#) remains relevant and necessary?

No exemption to the Privacy Act is claimed.

Section 4.2: PII and/or information types or groupings

To perform their various missions, federal agencies must necessarily collect various types of information. The checked boxes below represent the types of information maintained in the system or by the project. Information identified below is used by the system or project to fulfill the purpose stated in [Section 3.2](#) – Authority to Collect.

Biographical/General Information		
<input checked="" type="checkbox"/> Name	<input checked="" type="checkbox"/> Gender	<input type="checkbox"/> Group/Organization Membership
<input checked="" type="checkbox"/> Date of Birth	<input checked="" type="checkbox"/> Race	<input type="checkbox"/> Military Service Information
<input checked="" type="checkbox"/> Home Physical/Postal Mailing Address	<input checked="" type="checkbox"/> Ethnicity	<input checked="" type="checkbox"/> Personal Home Phone or Fax Number
<input type="checkbox"/> Zip Code	<input checked="" type="checkbox"/> Personal Cell Number	<input type="checkbox"/> Alias (including nickname)
<input type="checkbox"/> Business Physical/Postal Mailing Address	<input type="checkbox"/> Business Cell Number	<input checked="" type="checkbox"/> Business Phone or Fax Number
<input checked="" type="checkbox"/> Personal e-mail address	<input type="checkbox"/> Nationality	<input type="checkbox"/> Mother’s Maiden Name
<input type="checkbox"/> Business e-mail address	<input type="checkbox"/> Country of Birth	<input type="checkbox"/> Spouse Information
<input checked="" type="checkbox"/> Personal Financial Information (including loan information)	<input type="checkbox"/> City or County of Birth	<input type="checkbox"/> Children Information
<input type="checkbox"/> Business Financial Information (including loan information)	<input type="checkbox"/> Immigration Status	<input type="checkbox"/> Information about other relatives.
<input checked="" type="checkbox"/> Marital Status	<input type="checkbox"/> Citizenship	<input type="checkbox"/> Professional/personal references or other information about an individual’s friends, associates or acquaintances.
<input type="checkbox"/> Religion/Religious Preference	<input type="checkbox"/> Device settings or preferences (e.g., security level, sharing options, ringtones).	<input type="checkbox"/> Global Positioning System (GPS)/Location Data
<input type="checkbox"/> Sexual Orientation	<input type="checkbox"/> User names, avatars etc.	<input type="checkbox"/> Secure Digital (SD) Card or Other Data stored on a card or other technology
<input type="checkbox"/> Cell tower records (e.g., logs, user location, time etc.)	<input type="checkbox"/> Network communications data	<input type="checkbox"/> Cubicle or office number
<input type="checkbox"/> Contact lists and directories (known to contain personal information)	<input type="checkbox"/> Contact lists and directories (not known to contain personal information, but uncertain)	<input type="checkbox"/> Contact lists and directories (known to contain only business information)
<input checked="" type="checkbox"/> Education Information	<input type="checkbox"/> Resume or curriculum vitae	<input type="checkbox"/> Other (please describe):
<input type="checkbox"/> <input checked="" type="checkbox"/> Other (please describe): PHA Household ID Number	<input type="checkbox"/> Other (please describe):	<input checked="" type="checkbox"/> Other (please describe): Birth year, job title, years of work experience, professional certifications, range of total compensation

Identifying Numbers

- | | |
|--|--|
| <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Full Social Security number <input type="checkbox"/> Truncated/Partial Social Security number (e.g., last 4 digits) <input type="checkbox"/> Personal Taxpayer Identification Number
 <input type="checkbox"/> Personal Credit Card Number <input type="checkbox"/> Personal Vehicle Identification Number <input type="checkbox"/> Personal License Plate Number <input type="checkbox"/> File/Case ID Number (individual) <input type="checkbox"/> Personal Professional License Number <input type="checkbox"/> Employee Identification Number <ul style="list-style-type: none"> <input type="checkbox"/> Business Bank Account Number <input type="checkbox"/> Commercially obtained internet navigation/purchasing habits of individuals <input type="checkbox"/> Business License Plate Number (non-sole-proprietor) <input type="checkbox"/> Personal device identifiers or serial numbers,
 <input type="checkbox"/> Passport Number and Passport information (including full name, passport number, DOB, POB, sex, nationality, issuing country photograph and signature) (use “Other” if some but not all elements are collected) | <ul style="list-style-type: none"> <input type="checkbox"/> Health Plan Beneficiary Number <input type="checkbox"/> Alien Registration Number
 <input type="checkbox"/> Business Taxpayer Identification Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor)
 <input type="checkbox"/> Business Credit Card Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor) <input type="checkbox"/> Business Vehicle Identification Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor) <input type="checkbox"/> Business License Plate Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor) <input type="checkbox"/> File/Case ID Number (business) (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor) <input type="checkbox"/> Business Professional License Number (If known: <input type="checkbox"/> sole proprietor; <input type="checkbox"/> non-sole proprietor) <input type="checkbox"/> Patient ID Number <input type="checkbox"/> Personal Bank Account Number <input type="checkbox"/> Government obtained internet navigation/purchasing habits of individuals <input type="checkbox"/> Driver’s License Number
 <input type="checkbox"/> Other Identifying Numbers (please describe):

 <input type="checkbox"/> Other Identifying Numbers (please describe): |
|--|--|

Medical/Emergency Information Regarding Individuals

- | | | |
|--|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> Medical/Health Information <input type="checkbox"/> Mental Health Information
 <input type="checkbox"/> Other (please describe): | <ul style="list-style-type: none"> <input type="checkbox"/> Worker’s Compensation Act Information <input type="checkbox"/> Disability Information | <ul style="list-style-type: none"> <input type="checkbox"/> Patient ID Number <input type="checkbox"/> Emergency Contact Information (e.g., a third party to contact in case of emergency) |
|--|---|--|

Biometrics/Distinguishing Features/Characteristics of Individuals

- | | | |
|--|---|---|
| <input type="checkbox"/> Physical description/ characteristics (e.g., hair, eye color, weight, height, sex, gender etc.) | <input type="checkbox"/> Signatures | <input type="checkbox"/> Vascular scans |
| <input type="checkbox"/> Fingerprints | <input type="checkbox"/> Photos | <input type="checkbox"/> Retina/Iris Scans |
| <input type="checkbox"/> Palm prints | <input type="checkbox"/> Video | <input type="checkbox"/> Dental Profile |
| <input type="checkbox"/> Voice audio recording | <input type="checkbox"/> Scars, marks, tattoos | <input type="checkbox"/> DNA Sample or Profile |
| <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): |

Specific Information/File Types

- | | | |
|--|--|--|
| <input type="checkbox"/> Taxpayer Information/Tax Return Information | <input type="checkbox"/> Law Enforcement Information | <input type="checkbox"/> Security Clearance/Background Check Information |
| <input type="checkbox"/> Civil/Criminal History Information/Police Records (government source) | <input type="checkbox"/> Credit History Information (government source) | <input type="checkbox"/> Bank Secrecy Act Information |
| <input type="checkbox"/> Civil/Criminal History Information/Police Records (commercial source) | <input type="checkbox"/> Credit History Information (commercial source) | <input type="checkbox"/> National Security/Classified Information |
| <input type="checkbox"/> Protected Information (as defined in HUD Directive 25-10) | <input type="checkbox"/> Case files | <input type="checkbox"/> Personnel Files |
| <input type="checkbox"/> Information provided under a confidentiality agreement | <input type="checkbox"/> Information subject to the terms of an international or other agreement | <input type="checkbox"/> Other (please describe): |

Audit Log and Security Monitoring Information

- | | | |
|---|---|---|
| <input type="checkbox"/> User ID assigned to or generated by a user of HUD IT | <input type="checkbox"/> Date and time an individual accesses a facility, system, or another IT | <input type="checkbox"/> Files accessed by a user of HUD IT (e.g., web navigation habits) |
| <input type="checkbox"/> Passwords generated by or assigned to a user of HUD IT | <input type="checkbox"/> Internet or other queries run by a user of HUD IT | <input type="checkbox"/> Contents of files accessed by a user of HUD IT |
| <input type="checkbox"/> Biometric information used to access HUD facilities or IT | <input type="checkbox"/> Video of individuals derived from security cameras | <input type="checkbox"/> Public Key Information (PKI). |
| <input type="checkbox"/> Information revealing an individual's presence in a particular location as derived from security token/key fob, employee identification card scanners or other IT or devices | <input type="checkbox"/> Still photos of individuals derived from security cameras. | <input checked="" type="checkbox"/> Internet Protocol (IP) Address |
| <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): | <input type="checkbox"/> Other (please describe): |

Other

Other (please describe:

Other (please describe:

Other (please describe:

Other (please describe:

Section 4.3: Sources of information and the method and manner of collection

Service Coordinators	Focus Group Participants
<p>Specific PII identified in Section 4.2 that was acquired from this source:</p> <p><u>Site Visit Interviews</u> Full names and business email addresses of FSS coordinators for the purpose of contacting the service coordinators to conduct the interviews. Supervisor and Case Manager full names, business email addresses, for the purpose of contacting for interviews.</p> <p><u>FSS Participant Survey:</u> Race, ethnicity, gender, marital status, birth date, level of education, years of work experience, home address; public assistance case number; public assistance PersonID number, Unemployment Insurance Wage state or federal level; Federal employee ID Numbers,</p>	<p>Specific PII identified in Section 4.2 that was acquired from this source:</p> <p>Full names Phone or mobile phone numbers for the purpose of scheduling the interviews.</p>
<p>Manner in which information is acquired from source by Housing and Urban Development project/system: (select all that apply):</p>	<p>Manner in which information is acquired from source by Housing and Urban Development project/system: (select all that apply):</p>
<p><input checked="" type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group</p>	<p><input checked="" type="checkbox"/> From a paper or electronic form provided to individuals, the public or members of a particular group</p>
<p>HUD contract with MDRC, OMB Control #2528-0296, Informed Consent language</p>	<p>HUD contract with MDRC, OMB Control #2528-0296, Informed Consent language</p>
<p><input type="checkbox"/> Received in paper format other than a form.</p>	<p><input type="checkbox"/> Received in paper format other than a form.</p>

<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.	<input type="checkbox"/> Delivered to the project on disk or other portable device and uploaded to the system.
<input type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet	<input type="checkbox"/> Accessed and downloaded or otherwise acquired via the internet
<input checked="" type="checkbox"/> Email	<input type="checkbox"/> Email
<input type="checkbox"/> Scanned documents uploaded to the system.	<input type="checkbox"/> Scanned documents uploaded to the system.
<input type="checkbox"/> Bulk transfer	<input type="checkbox"/> Bulk transfer
<input type="checkbox"/> Extracted from particular technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).	<input type="checkbox"/> Extracted from particular technology (e.g., radio frequency identification data (RFID) devices, video or photographic cameras, biometric collection devices).
<input type="checkbox"/> Fax	<input type="checkbox"/> Fax
<input checked="" type="checkbox"/> Extracted from notes of a phone interview or face to face contact	<input checked="" type="checkbox"/> Extracted from notes of a phone interview or face to face contact
<input type="checkbox"/> Other: Please describe:	<input type="checkbox"/> Other: Please describe:
<input type="checkbox"/> Other: Please describe:	<input type="checkbox"/> Other: Please describe:

Section 4.4: Privacy and/or civil liberties risks related to collection

Notice of Authority, Principal Uses, Routine Uses, and Effect of not Providing Information

When Federal agencies use a form to obtain information from an individual that will be maintained in a [system of records](#), they must inform the individual of the following: “(A) the authority (whether granted by statute, or by executive order of the President) which authorizes the solicitation of the information and whether disclosure of such information is mandatory or voluntary; (B) the principal purpose or purposes for which the information is intended to be used; (C) the routine uses which may be made of the information as published pursuant to paragraph (4)(D) of this subsection; and (D) the effects on her/him, if any, of not providing all or any part of the requested information.” 5 U.S.C § 522a(e)(3).

[Section 4.4\(a\)](#) Yes No Is any of the [PII](#) maintained in the system or by the project collected directly from an individual? [Section 4.4\(b\)](#) Yes No N/A Was the information collected from the individual using a form (paper or electronic)?

[Section 4.4\(c\)](#) Yes No N/A If the answer to Section 4.4(b) was “yes,” was the individual notified (on the form in which the [PII](#) was collected or on a separate form that can be retained by the individual) about the following at the point where the information was collected (e.g., in a form; on a website).

- The authority (whether granted by statute, or by Executive order of the President) which authorizes the solicitation of the information.
- Whether disclosure of such information is mandatory or voluntary.
- The principal purpose or purposes for which the information is intended to be used.
- The individuals or organizations outside of HUD with whom the information may be/ will be shared.
- The effects on the individual, if any, if they decide not to provide all or any part of the requested information.

Authority to offer confidentiality is made on the basis of:

- a) Section 3(b) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3532, authorizes the Secretary to “conduct continuing comprehensive studies, and make available findings, with respect to the problems of housing and urban development.”
- b) Section 7(r)(1) of the Department of Housing and Urban Development Act, as amended, 42 U.S.C. 3535, provides that appropriated funds “shall be available to the Secretary for evaluating and monitoring of all such programs . . . and collecting and maintaining data for such purposes.” Subsection (r)(4)(a) of the act further provides that the Secretary “may provide for evaluation and

monitoring under this subsection and collecting and maintaining data for such purposes directly or by grants, contracts, or interagency agreements.”

c) Section 502(g) of title V of the Housing and Urban Development Act of 1970, as amended, 12 USC 1701z-2 (g), authorizes the Secretary “to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies.” It further provides that “[a]ny such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment.

Before beginning all surveys, respondents will be provided an explanation of the purpose of the evaluation and how their responses will be used. Participants in the survey will be promised that their individual responses will be confidential and will be reported only in the aggregate, and they will be asked to affirm their consent per IRB guidelines for human subject research.

The survey research instruments will be reviewed and approved by the MDRC’s internal Institutional Review Board prior to initiating any research, which operates according to the Common Rule on the Protection of Human Subjects found in Title 45 of the Code of Federal Regulations, Part 46 (45 CFR 46).

Interview respondents will be asked to provide their informed consent per IRB guidelines for human subject research, with appropriate confidentiality guaranteed that their comments will only be summarized in aggregate and/or the specific details masked/changed to protect their identity, and will not affect their access to future Family Self-Sufficiency Program funding.

MDRC’s research plans for the site visits will be subject to federal human subject review standards to protect the confidentiality of all research subjects, including all persons interviewed. The site visit research protocols will be reviewed and approved by the MDRC’s Institutional Review Board prior to initiating any research. The interview protocols will receive a higher level of scrutiny through a Full Review by the Board due to the inclusion of economically disadvantaged individuals to ensure their rights as human subjects are protected. All raw and summarized data will be securely stored according to HUD protocol, including proper password-protection and encryption as required for files containing personally identifiable information.

Use of Social Security Numbers

Social Security numbers (“SSN”) are commonly used by identity thieves to commit fraudulent acts against individuals. The SSN is one data element that has the ability to harm the individual and requires more protection when used. Therefore, and to reduce risk to individuals and federal agencies, OMB Memorandum M-17-12, Preparing for and Responding to a Breach of Personally Identifiable Information, (January 3, 2017) required agencies to reduce the use of SSNs in agency systems and programs and to identify instances in which the collection is superfluous. In addition, OMB mandated agencies to explore alternatives to agency use of SSNs as personal identifiers for Federal employees and members of the public.

In addition, the [Privacy Act](#) provides that: “It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law

because of such individual's refusal to disclose his social security account number." Pub. L. No. 93-579, § 7. This provision does not apply to: (1) any disclosure which is required by federal statute; or (2) any disclosure of an SSN to any federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, if such disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. *Id.* at § 7(a)(2)(A)-(B).

Section 4.4(d) Yes No N/A Does the system or project maintain SSNs?

Section 4.4(e) Yes No N/A Are there any alternatives to the SSNs as a personal identifier? If yes, please provide a narrative explaining why other alternatives to identify individuals will not be used.

Section 4.4(f) Yes No N/A Will individuals be denied any right, benefit, or privilege provided by law because of such individual's refusal to disclose their SSN? If yes, please check the applicable box:

- SSN disclosure is required by Federal statute or Executive Order. ; or
- the SSN is disclosed to any Federal, state, or local agency maintaining a [system of records](#) in existence and operating before January 1, 1975, and disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. *If checked, please provide the name of the system of records in the space provided below.;*

Section 4.4 (g) Yes No N/A When the SSN is collected, are individuals given notice whether disclosure is mandatory or voluntary, the legal authority such number is solicited, and what uses will be made of it? If yes, please explain what means are used to provide notice.

SSNs are being collected.

First Amendment Activities

The [Privacy Act](#) provides that Federal agencies “maintain no record describing how any individual exercises rights guaranteed by the First Amendment unless expressly authorized by statute or by the individual about whom the record is maintained or unless pertinent to and within the scope of an authorized law enforcement activity.” 5 U.S.C. § 552a(e)(7).

Section 4.4(h) Yes No Does the system or project maintain any information describing how an individual exercises their rights guaranteed by the First Amendment?

Section 4.4(h) If the system or project maintains information describing how an individual exercises their rights guaranteed by the First Amendment, do any of the following exceptions apply (the information may be maintained if any of the exceptions apply)?

N/A (system or project does not maintain any information describing how an individual exercises their rights guaranteed by the First Amendment so no exceptions are needed)

The individual about whom the information was collected or maintained expressly authorizes its collection/maintenance.

The information maintained is pertinent to and within the scope of an authorized law enforcement activity.

There is a statute that expressly authorizes its collection.

N/A, the system or project does not maintain any information describing how any individual exercises their rights guaranteed by the First Amendment.

Section 5: Maintenance, use, and sharing of the information

The following sections require a clear description of the system's or project's use of information.

Section 5.1: Describe how and why the system or project uses the information it collects and maintains

Please describe all of the uses of the information types and groupings collected and maintained by the system or project (see [Section 4.2](#)), including a discussion of why the information is used for this purpose and how it relates to the mission of the office that owns the system.

The information that is being collected as part of the site visit interviews to enable the study team to carry out qualitative data analysis. The information that is being collected as part of the administrative analysis and will be used to enable the study team to conduct the FSS Supervisor, Case Manager, FSS Coordinator (staff) and FSS Participant surveys. The information that is being collected from these surveys will be reported in the aggregate to present summary, aggregate level

information about what FSS providers do, understand the people they serve and how the FSS program services impact their lives. All information will be reported in aggregate, and the aggregate data would be scrubbed prior to any data submission to HUD. FSS participant data will be destroyed upon completion of the interviews. Site visit interview data will be scrubbed and any names, phone numbers, and business email addresses will be destroyed upon completion of the site visit notes. Full names and business email addresses will be destroyed upon completion of the survey. No names, phone numbers, or business email addresses will be retained or linked to any other data provided by any of the service coordinators or FSS participants. MDRC's Institutional Review Board, which provides an independent, rigorous, human subjects review, has reviewed and approved the methodology and instruments as providing sufficient human subject and privacy protection.

A 60-day Federal Register notice was published on July 14, 2017: "Family Self-Sufficiency (FSS) Program Demonstration," Docket No. FR-6003-N-06. The information collected for this study is covered by OMB Control #2528-0296.

Collecting Information Directly from the Individual When Using it to Make Adverse Determinations About Them

The [Privacy Act](#) requires that Federal agencies "collect information to the greatest extent practicable directly from the subject individual when the information may result in adverse determinations about an individual's rights, benefits, and privileges under Federal programs." 5 U.S.C. § 552a(e)(2).

[Section 5.1\(a\)](#) Yes No Is it possible that the information maintained in the system or by the project may be used by HUD to make an adverse determination about an individual's rights, benefits, and privileges under federal programs (e.g., decisions about whether the individual will receive a financial benefit, get a clearance or access to a HUD facility, obtain employment with HUD)?

[Section 5.1\(b\)](#) Yes No Is it possible that HUD will share information maintained in the system or by the project with a third-party external to the Department that will use the information to make an adverse determination about an individual's rights, benefits, and privileges under federal programs?

[Section 5.1\(c\)](#) Yes No N/A If information could potentially be used to make an adverse determination about an individual's rights, benefits, and privileges under federal programs, does the system or project collect information (to the greatest extent practicable) directly from the individual?

The purpose of this data system is to conduct research about the Family Self-Sufficiency program, not to make any determination about an individual's rights, benefits, or privileges under any federal programs.

Data Mining

As required by Section 804 of the [Implementing the 9/11 Commission Recommendations Act of 2007](#) (“9-11 Commission Act”), HUD reports annually to Congress on its data mining activities.

Section 5.1(d) Yes No Is information maintained in the system or by the project used to conduct “data-mining” activities as that term is defined in the [Implementing the 9-11 Commission Act](#)?

No data mining is occurring as part of this study.

Section 5.2: Ensuring accuracy, completeness, and timeliness of information collected, maintained, and shared

Exemption from Accuracy, Relevance, Timeliness, and Completeness Requirements

The [Privacy Act](#) requires that Federal agencies “maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.” 5 U.S.C § 552a(e)(5). If a particular [system of records](#) meets certain requirements (including the [NPRM](#) process defined in Section 2 above), an agency may exempt the [system of records](#) (or a portion of the records) from this requirement.

Section 5.2(a) Yes No Is all or any portion of the information maintained in the system or by the project: (a) part of a [system of records](#) and (b) exempt from the accuracy, relevance, timeliness, and completeness requirements in sections (e)(5) of the [Privacy Act](#)?

The information that is being collected as part of the site visit interviews to enable the study team to carry out qualitative data analysis. The information that is being collected as part of the administrative analysis and will be used to enable the study team to conduct the FSS Supervisor, Case Manager, FSS Coordinator (staff) and FSS Participant surveys. The information that is being collected from these surveys will be reported in the aggregate to present summary, aggregate level information about what FSS providers do, understand the people they serve and how the FSS program services impact their lives. All information will be reported in aggregate, and the aggregate data would be scrubbed prior to any data submission to HUD. FSS participant data will be destroyed upon completion of the interviews. Site visit interview data will be scrubbed and any names, phone numbers, and business email addresses will be destroyed upon completion of the site visit notes. Full names and business email addresses will be destroyed upon completion of the survey. No names, phone numbers, or business email addresses will be retained or linked to any other data provided by any of the service coordinators or FSS participants. MDRC’s Institutional Review Board, which provides an independent, rigorous, human subjects review, has reviewed and approved the methodology and instruments as providing sufficient human subject and privacy protection.

A 60-day Federal Register notice was published on July 14, 2017: “Family Self-Sufficiency (FSS) Program Demonstration,” Docket No. FR-6003-N-06. The information collected for this study is covered by OMB Control #2528-0296.

Computer Matching

The Computer Matching and Privacy Protection Act of 1988 amended the [Privacy Act](#) imposing additional requirements when [Privacy Act systems of records](#) are used in computer matching programs.

Pursuant to the [Privacy Act](#), as amended, there are two distinct types of matching programs. The first type of matching program involves the computerized comparison of two or more automated federal personnel or payroll [systems of records](#) or a system of federal personnel or payroll records with non-federal records. This type of matching program may be conducted for any purpose. The second type of matching program involves the computerized comparison of two or more automated [systems of records](#) or a [system of records](#) with non-federal records. The purpose of this type of matching program must be for the purpose of eligibility determinations or compliance requirements for applicants, recipients, beneficiaries, participants, or providers of services for payments or in-kind assistance under federal benefit programs, or recouping payments or delinquent debts under such federal benefit programs. *See* 5 U.S.C. § 522a(a)(8).

Matching programs must be conducted pursuant to a matching agreement between the source and recipient agencies. The matching agreement describes the purpose and procedures of the matching **and** establishes protections for matching records.

[Section 5.2\(b\)](#) Yes No Is any of the information maintained in the system or by the project (a) part of a [system of records](#) and (b) used as part of a matching program?

[Section 5.2\(c\)](#) Yes No N/A Is there a matching agreement in place that contains the information required by Section (o) of the [Privacy Act](#)?

[Section 5.2\(d\)](#) Yes No N/A Are assessments made regarding the accuracy of the records that will be used in the matching program?

[Section 5.2\(e\)](#) Yes No N/A Does the office that owns the system or project independently verify the information, provide the individual notice and an opportunity to contest the findings, or

obtain Data Integrity Board approval in accordance with Section (p) of the [Privacy Act](#) before taking adverse action against the individual?

There is no matching program.

Ensuring Fairness in Making Adverse Determinations About Individuals

Federal agencies are required to “maintain all records which are used by the agency in making any determination about any individual with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination.” 5 U.S.C. § 552a(e)(5). This requirement also applies when merging records from two or more sources where the merged records are used by the agency to make any determination about any individual.

[Section 5.2\(f\)](#) Yes No With respect to the information maintained in the system or by the project, are steps taken to ensure all information used to make a determination about an individual is maintained with such accuracy, relevance, timeliness, and completeness as is reasonably necessary to assure fairness to the individual in the determination? *to make determinations about an individuals selected “no” because you do not use information in the system or project to make determinations about individuals*

The system is for research purposes only and is not involved in any determinations about individuals.

Merging Information About Individuals

[Section 5.2\(g\)](#) Yes No Is information maintained in the system or by the project merged with electronic or non-electronic information from internal or external sources (e.g., other files or systems)?

The only purpose of any merging is to compare the results from the PHA site visits to HUD administrative records to verify information provided at the site visit.)

[Section 5.2\(h\)](#) Yes No N/A Once merged, is the information used in making determinations about individuals (e.g., decisions about whether the individual will receive a financial benefit or payment, get a clearance or access to a HUD facility, obtain employment with HUD, etc.)?

[Section 5.2\(i\)](#) Yes No N/A Are there documented policies or procedures for how information is merged?

Section 5.2(j) Yes No N/A Do the documented policies or procedures address how to proceed when partial matches (where some, but not all of the information being merged matches a particular individual) are discovered after the information is merged? The agreements mentioned above define the match criteria.

Section 5.2(k) Yes No N/A If information maintained in the system or by the project is used to make a determination about an individual, are steps taken to ensure the accuracy, relevance, timeliness, and completeness of the information as is reasonably necessary to assure fairness to the individual?

The system is for research purposes only and is not involved in any determinations about individuals.

Policies and Standard Operating Procedures or Technical Solutions Designed to Ensure Information Accuracy, Completeness, and Timeliness

Section 5.2(l) Yes No N/A If information maintained in the system or by the project is used to make any determination about an individual (even if it is an exempt [system of records](#)), are there documented policies or standard operating procedures for the system or project that address the accuracy, completeness, and timeliness of the information? :

Section 5.2(m) Yes No Does the system or project use any software or other technical solutions designed to improve the accuracy, completeness, and timeliness of the information used to make an adverse determination about an individual's rights, benefits, and/or privileges (regardless of if it is an exempt [system of records](#))?

The system is for research purposes only and is not involved in any determinations about individuals. During the analysis, the study team reviews the data to be sure it is complete and accurate. If there are any questions, they go back to the source to resolve.

Accuracy, Completeness, and Timeliness of Information Received from the Source

Section 5.2(n) Yes No Did HUD receive any guarantee, assurance, or other information from any information source(s) regarding the accuracy, timeliness and completeness of the information maintained in the system or by the project?

The contract with MDRC and its subcontractor, M. Davis, provides a guarantee and assurance of the accuracy, timeliness, and completeness of the information maintained in the system.

Disseminating Notice of Corrections of or Amendments to PII

Section 5.2(o) Yes No N/A Where feasible and appropriate, is there a process in place for disseminating corrections of or amendments to the [PII](#) maintained in the system or by the project to all internal and external information-sharing partners?

Section 5.2(p) Yes No N/A Where feasible and appropriate, does the process for disseminating corrections or amendments include notifying the individual whose information is corrected or amended?

This data system is for research purposes only and not related to any corrections or amendments to the PII maintained in any system related to any internal or external information-sharing partners.

Section 5.3: Information sharing within the Department of Housing and Urban Development

Internal Information Sharing

Section 5.3(a) Yes No Is [PII](#) maintained in the system or by the project shared with other HUD bureaus?

No PII will be shared with anyone at HUD or outside of the study team.

Section 5.3(b) Yes No Does Housing and Urban Development office that receives the [PII](#) limit access to those HUD officers and employees who have a need for the [PII](#) in the performance of their official duties (i.e., those who have a “need to know”)?

N/A because there is no approved sharing of PII from MDRC with anyone at HUD.

Memorandum of Understanding/Other Agreements Limiting HUD’s Internal Use/Disclosure of PII

Section 5.3(c) Yes No N/A Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency that provided the information to Housing and Urban Development or subject to an international agreement or treaty) that limits or places conditions on HUD's internal use, maintenance, handling, or disclosure of the [PII](#)?

There is a contract and in place between HUD and MDRC, and a Consent Form approved by OMB established between MDRC and the study participants. (See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.) The information collected for this study is covered by OMB Control #2528-0296.

Internal Information Sharing Chart	
Internal Recipient's Name (e.g., or office)	MDRC
Purpose of the Sharing	N/A. There is no internal sharing of PII.
PII Shared	
Applicable Statutory or Regulatory or Restrictions on Information Shared	
Applicable Restrictions Imposed by Agreement on Information Shared (e.g., by HUD agreement with the party that provided the information to HUD)	
Name and Description of MOU or Other Agreement Restricting HUD's Internal Use, Maintenance, Handling, or Sharing of PII Received	
Method of PII Transfer (e.g., paper/oral disclosures/magnetic disk/portable device/email/fax/other (please describe if other))	There is no transfer of PII or sharing of PII with HUD or anyone outside of the research team.

[Section 5.4: Information sharing with external \(i.e., outside HUD\) organizations and individuals](#)

External Information Sharing
Section 5.4(a) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Is PII maintained in the system or by the project shared with agencies, organizations, or individuals external to HUD?
There is no sharing of PII outside of the study team.

Accounting of Disclosures

Section 5.4(b) Yes No N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), do you maintain a paper or electronic log or other record of the date, nature, and purpose of each disclosure (not including intra-agency disclosures and FOIA disclosures) of a record to any person or to another agency (outside of HUD) and the name and address of the person or agency to whom the disclosure is made? See 5 U.S.C § 552a(c).

Section 5.4(c) Yes No N/A If you do not keep a running tabulation of every disclosure at the time it is made, are you able to reconstruct an accurate and complete accounting of disclosures so as to be able to respond to [Privacy Act](#) requests in a timely fashion?

Section 5.4(d) Yes No N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), do you retain the log or other record of the date, nature, and purpose of each disclosure, for at least five years or the life of the record, whichever is longer, after the disclosure for which the accounting is made?

Section 5.4(e) Yes No N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), does your or office exempt the [system of records](#) (as allowed by the [Privacy Act](#) in certain circumstances) from the requirement to make the accounting available to the individual named in the record?

Section 5.4(f) Yes No N/A With respect to [records](#) maintained in the system or by the project that are subject to the [Privacy Act](#), does your or office exempt the [system of records](#) (as allowed by the [Privacy Act](#) in certain circumstances) from the requirement to inform any person or other agency about any correction or notation of dispute made by the agency of any [record](#) that has been disclosed to the person or agency if an accounting of the disclosure was made?

There is no non-compliance or basis for exemption from the Privacy Act which mitigates against any privacy and civil liberties risks.

Statutory or Regulatory Restrictions on Disclosure

Section 5.4(g) Yes No In addition to the [Privacy Act](#), are there any other statutory or regulatory restrictions on the sharing of any of the PII maintained in the system or by the project (e.g., 26 U.S.C § 6103 for tax returns and return information)?

12 U.S.C. §1701z-1 established PD&R and its authority to conduct research. 12 U.S.C. 1701z-2(g) Information and data, gives PD&R the authority to request personal information from people. (See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.) The information collected for this study is covered by OMB Control #2528-0296.

Memorandum of Understanding Related to External Sharing

Section 5.4(h) Yes No N/A Has HUD executed a Memorandum of Understanding, or entered into any other type of agreement, with any external agencies, organizations, or individuals with which/whom it shares [PII](#) maintained in the system or by the project?

HUD executed a contract with MDRC in March 2012 to conduct the Family Self-Sufficiency Program evaluation, and data collection activities are subject to the Privacy Act, a HUD-MDRC, and OMB-approved consent forms that MDRC has established with the study participants. (See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.) The information collected for this study is covered by OMB Control #2528-0296.

Memorandum of Understanding Limiting HUD's Use or Disclosure of PII

Section 5.4(i) Yes No Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement (e.g., agreement with another federal or state agency, an international agreement or treaty, or contract with private vendor that provided the information to HUD) that limits or places conditions on HUD's internal use or external (i.e., outside HUD) sharing of the [PII](#)?

HUD executed a contract with MDRC in March 2012 to conduct the Family Self-Sufficiency Program evaluation, and their data collection is subject to the Privacy Act, a HUD-MDRC, and OMB-approved consent forms that MDRC have established with the study participants. The information collected for this study is covered by OMB Control #2528-0296. (See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.)

All of these agreements preclude MDRC from sharing any PII with HUD or any other external entity.

Memorandum of Understanding Limiting External Party's Use or Disclosure of PII

Section 5.4(j) Yes No Is any of the [PII](#) maintained in the system or by the project subject to the requirements of a Memorandum of Understanding or other agreement in which HUD limits or places conditions on an external party's use, maintenance, handling, or disclosure of [PII](#) shared by HUD?

HUD executed a contract with MDRC in March 2012 to conduct the Family Self-Sufficiency Program evaluation, and their data collection is subject to the Privacy Act, a HUD-MDRC, and OMB-approved consent forms that MDRC has executed with the study participants(See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.) The information collected for this study is covered by OMB Control #2528-0296.

External Information Sharing Chart

[Section 5.4\(k\)](#) Yes No Is information from the system or project shared externally?

External Recipient's Name			
Purpose of the Sharing PII Shared			
Content of Applicable Routine Use/Citation to the SORN			
Applicable Statutory or Regulatory or Restrictions on Information Shared			
Name and Description of Relevant MOUs or Other Agreements Containing Sharing Restrictions Imposed on HUD by an External Source or Source/Originating Agency (including description of restrictions imposed on use, maintenance, and disclosure of PII)			
Name and Description of Relevant MOUs or Other Agreements Containing Restrictions Imposed by HUD on External Sharing			

Partner (including description of restrictions imposed on use, maintenance, and disclosure of PII)			
Method(s) Used to Transfer PII (e.g., paper/oral disclosures/magnetic disk/portable device/email fax/other (please describe if other))			
There is no external sharing of information based on the contract, and a NDA is in place between HUD and MDRC. A Consent Form is in place between the MDRC and the study participants. The information collected for this study is covered by OMB Control #2528-0296.			

Obtaining Consent Prior to New Disclosures Not Included in the SORN or Authorized by the Privacy Act

[Section 5.4\(l\)](#) Yes No N/A Is the individual’s consent obtained, where feasible and appropriate, prior to any **new** disclosures of previously collected records in a [system of records](#) (those not expressly authorized by the [Privacy Act](#) or contained in the published [SORN](#) (e.g., in the routine uses))?

Consent is required by the MDRC’s Institutional Review Board, by the consent form and was approved by OMB. (See Federal Register Notice, Docket No. FR-5613-N-07 published on 7/17/2012.) The information collected for this study is covered by OMB Control #2528-0296.

[Section 6: Compliance with federal information management requirements](#)

Responses to the questions below address the practical, policy, and legal consequences of failing to comply with one or more of the following federal information management requirements (to the extent required) and how those risks were or are being mitigated: (1) the [Privacy Act System of Records Notice Requirement](#); (2) the [Paperwork Reduction Act](#); (3) the [Federal Records Act](#); (4) the [E-Gov Act](#) security requirements; and (5) [Section 508 of the Rehabilitation Act of 1973](#).

[Section 6.1: Privacy Act System of Records Notice \(SORN\)](#)

For collections of [PII](#) that meet certain requirements, the [Privacy Act](#) requires that the agency publish a [SORN](#) in the *Federal Register*.

System of Records

[Section 6.1\(a\)](#) Yes No Does the system or project retrieve [records](#) about an individual using an identifying number, symbol, or other identifying particular assigned to the individual? (see items selected in [Section 4.2](#) above)

[Section 6.1\(b\)](#) Yes No N/A Was a [SORN](#) published in the *Federal Register* for this [system of records](#)?

[Section 6.2: The Paperwork Reduction Act](#)

The [PRA](#) requires OMB approval before a Federal agency may collect standardized data from 10 or more respondents within a 12-month period. OMB requires agencies to conduct a PCLIA (a HUD PCLIA) when initiating, consistent with the [PRA](#), a new electronic collection of PII for 10 or more persons (excluding agencies, instrumentalities, or employees of the federal government).

Paperwork Reduction Act Compliance

[Section 6.2\(a\)](#) Yes No Does the system or project maintain information obtained from individuals and organizations who are not federal personnel or an agency of the federal government (i.e., outside the federal government)?

[Section 6.2\(b\)](#) Yes No N/A Does the project or system involve a new collection of [information in identifiable form](#) for 10 or more persons from outside the federal government?

[Section 6.2\(c\)](#) Yes No N/A Did the project or system complete an Information Collection Request (“ICR”) and receive OMB approval?

The information collected for this study is covered by OMB Control #2528-0296.

Section 6.3: Records Management - NARA/Federal Records Act Requirements

Records retention schedules determine the maximum amount of time necessary to retain information in order to meet the needs of the project or system. Information is generally either disposed of or sent to the National Archives and Records Administration ([NARA](#)) for permanent retention upon expiration of this period.

NARA Records Retention Requirements

Section 6.3(a) Yes No Are the records used in the system or by the project covered by NARA's General Records Schedules ("GRS") or HUD/ Specific Records Schedule (SRS)?

Section 6.3(b) Yes No Did NARA approve a retention schedule for the records maintained in the system or by the project?

Section 6.3(c) Yes No N/A If NARA did not approve a retention schedule for the records maintained in the system or by the project and the records are not covered by NARA's GRS or HUD/ SRS, has a draft retention schedule (approved by all applicable HUD officials) been developed for the records used in this project or system?

2225.6 REV-1, Appendix 67, Records Disposition Schedule 67 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).

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

Section 6.4: E-Government Act/NIST Compliance

The completion of Federal Information Security Management Act ("FISMA") Security Assessment & Authorization (SA&A) process is required before a federal information system may receive Authority to Operate ("ATO"). Different security requirements apply to National Security Systems.

Federal Information System Subject to FISMA Security Assessment and Authorization

United States Department of Housing and Urban Development

November 20, 2017

[Section 6.4\(a\)](#) Yes No N/A Is the system a federal [information system](#) subject to FISMA requirements?

[Section 6.4\(b\)](#) Yes No N/A Has the system or project undergone a SA&A and received ATO?

Access Controls and Security Requirements

[Section 6.4\(c\)](#) Yes No Does the system or project include access controls to ensure limited access to information maintained by the system or project?

Only the MDRC research team can access the information/data collected.

Security Risks in Manner of Collection

[Section 6.4\(d\)](#) Yes No In [Section 4.3](#) above, you identified the sources for information used in the system or project and the method and manner of collection. Were any security, privacy, or civil liberties risks identified with respect to the manner in which the information is collected from the source(s)?

Security Controls When Sharing Internally or Externally

[Section 6.4\(e\)](#) Yes No N/A Are all HUD/ security requirements met in the method of transferring information (e.g., bulk transfer, direct access by recipient, portable disk, paper) from Housing and Urban Development project or system to internal or external parties?

The contract and NDA with MDRC specifies that they are to comply with HUD security requirements.

Monitoring of Individuals

[Section 6.4\(f\)](#) Yes No Will this system or project have the capability to identify, locate, and monitor individuals or groups of people?

There is no monitoring of individuals.

Audit Trails

[Section 6.4\(g\)](#) Yes No Are audit trails regularly reviewed for appropriate use, handling, and disclosure of [PII](#) maintained in the system or by the project inside or outside of the Department?

There is no disclosure of PII by the project inside or outside of the MDRC research team.

[Section 6.5: Section 508 of the Rehabilitation Act of 1973](#)

When Federal agencies develop, procure, maintain, or use Electronic and Information Technology (“EIT”), [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998) requires that individuals with disabilities (including federal employees) must have access and use (including privacy policies and directives as well as redress opportunities) that is comparable to that which is available to individuals who do not have disabilities.

Applicability of and Compliance With the Rehabilitation Act

[Section 6.5\(a\)](#) Yes No Will the project or system involve the development, procurement, maintenance or use of EIT as that term is defined in [Section 508 of the Rehabilitation Act of 1973](#) (as amended in 1998)? *The Rehabilitation Act is not applicable*

[Section 6.5\(b\)](#) Yes No N/A Does the system or project comply with all [Section 508](#) requirements, thus ensuring that individuals with disabilities (including federal employees) have access and use (including access to privacy and civil liberties policies) that is comparable to that which is available to individuals who do not have disabilities?

This is not a public facing system, so the impact of the lack of Section 508 compliance is minimized.

Section 7: Redress

Access Under the Freedom of Information Act and Privacy Act

Section 7.0(a) Yes No Does the agency have a published process in place by which individuals may seek records under the [Freedom of Information Act](#) and [Privacy Act](#)?

The HUD FOIA and PA disclosure regulations can be found at 24 CFR Pt. 15 (2001) and 24 CFR 16.1.

Privacy Act Access Exemption

Section 7.0(b) Yes No Was any of the information that is maintained in [system of records](#) and used in the system or project exempted from the access provisions of the [Privacy Act](#)?

Additional Redress Mechanisms

Section 7.0(c) Yes No With respect to information maintained by the project or system (whether or not it is covered by the [Privacy Act](#)), does the or office that owns the project or system have any additional mechanisms other than [Privacy Act](#) and FOIA remedies (e.g., a customer satisfaction unit; a complaint process) by which an individual may request access to and/or amendment of their information and/or contest adverse determinations about denial of their rights, benefits, and privileges under federal programs (e.g., decisions about whether the individual will receive a financial benefit, get a clearance or access to a HUD facility, obtain employment with HUD)?

There is contact information on the consent forms where individuals can ask questions or withdraw future participation from the study. This is a research study and so there is not involvement of rights, benefits, or privileges under federal programs.

Responsible Officials

Helen Goff Foster
Senior Agency Official for Privacy
U.S. Department of Housing and Urban Development

Elizabeth A. Cocke
Division Director
Affordable Housing Research and Technology Division
Office of Policy Development and Research
U.S. Department of Housing and Urban Development

Regina C. Gray
Social Science Analyst and Contracting Officer's Technical Representative
Affordable Housing Research and Technology Division
Office of Policy Development and Research
U.S. Department of Housing and Urban Development

Approval Signature

Helen Goff Foster
Senior Agency Official for Privacy
U.S Department of Housing Urban and Development