



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

Initial Privacy Assessment

**Public Housing Assessment System (PHAS) Appeals; PHAS
Unaudited Financial Statement Submission Extensions;
Assisted and Insured Housing Property Inspection Technical
Reviews and Database Adjustments (2577-257)**

**Office of Public and Indian Housing
Real Estate Assessment Center**

July 14, 2017

INITIAL PRIVACY ASSESSMENT (IPA)

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

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

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

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

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

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

Privacy@hud.gov

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

INITIAL PRIVACY ASSESSMENT (IPA) SUMMARY INFORMATION

Date Submitted for Review:

Name of System or Project: [Public Housing Assessment System \(PHAS\) appeals; PHAS Unaudited Financial Statement Submission Extensions; and Public Housing and Multifamily Housing Technical Reviews and Database Adjustments](#)

System Name in CSAM: [Office of Public and Indian Housing Real Estate Assessment Center Integrated Assessment Subsystem \(NASS\) and Physical Assessment Subsystem \(PASS\)](#)

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

Name of Project Manager or System Owner: [Dee Ann R. Walker \(NASS\) Samuel Tuffour \(PASS\)](#)

Email for Project Manager or System Owner:

Deeann.R.walker@hud.gov and Samuel.X.Tuffour@hud.gov

Phone Number for Project Manager or System Owner: [Dee Ann Walker \(202\) 475-7908 and Samuel Tuffour \(202\) 475-8604](#)

Type of Project:

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

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

The HUD assessment regulation governing public housing agencies (24 CFR part 902) provides a right to appeal assessment scores and designations. It also provides a right to request a database adjustment and technical review of property inspection results. HUD's regulation governing the physical condition of multifamily assisted (24 CFR part 200) and insured properties provides property owners with the right to request a database adjustment and technical review of property inspection results. Section 902.60 of HUD's assessment regulation also provides that PHAs may request an extension of time to submit required unaudited financial information.

Public housing agencies and multifamily property owners must submit appeals of the scores in writing. They do so by mail (e.g., USPS, UPS), by email or through a website application in NASS which is part of HUD Secure Systems. Public housing agencies and multifamily property owners must submit database adjustments and technical reviews in writing. They do so by mail (e.g., USPS, UPS etc.) or by email. Public housing agencies must request an extension of time to submit unaudited financial information electronically through a website application in NASS

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed: 1998

Date last updated: May 2017 for system enhancement that have no impact on users submitting these requests to HUD.

<Please provide a general description of the update.>

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

HUD Employees

Contractors working on behalf of HUD

The Public

The System does not contain any such information.

None of the above. The information is collected from PHAs and multifamily property owners.

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

No.

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

<Please explain the purpose of the collection, the function and the legal authority to collect, maintain or transmit the SSN.>

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

None is collected.

6. If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?

- No. Please continue to the next question.

- Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

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

Header

Payload Please describe the data that is logged.

<Please list the data elements in the log.>

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

- No.

Yes. Please list the systems:

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

8. Does the system meet all of the following requirements?

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

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

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

assigned to the individual.

- No.
- Yes.

If yes is there an existing System of Record Notice?

- No.
- Yes.

[None are applicable](#)

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

Unknown

No

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

Confidentiality: Low Moderate High

Integrity: Low Moderate High

Availability: Low Moderate High

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

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

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

DESIGNATION

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

This IS a Privacy Sensitive System
Category of System

- IT System
- Legacy System
- HR System
- Rule
- Other: _____

Determination

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

HUD PRIVACY BRANCH COMMENTS:

DOCUMENT ENDORSMENT

| |
|-----------------------------------|
| DATE REVIEWED: |
| PRIVACY REVIEWING OFFICIALS NAME: |

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

| | |
|---|-------------|
| SYSTEM OWNER << INSERT NAME/TITLE >> << INSERT PROGRAM OFFICE >> | Date |
|---|-------------|

| | |
|---|-------------|
| PROGRAM AREA MANAGER << INSERT NAME/TITLE >> << INSERT PROGRAM OFFICE >> | Date |
|---|-------------|

| | |
|---|-------------|
| CHIEF PRIVACY OFFICER << INSERT NAME/TITLE >> OFFICE OF THE EXECUTIVE SECRETARIAT | Date |
|---|-------------|