

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

**INITIAL PRIVACY ASSESSMENT
(IPA)**

**Application for
Displacement/Relocation/Temporary
Relocation Assistance for Persons
Displaced by, or Temporarily
Relocated for Certain HUD Programs**

**Community Planning and
Development
Office of Affordable Housing**

February 12, 2018

INTRODUCTION

What is an Initial Privacy Assessment?

An Initial Privacy Assessment (IPA) is designed to assess whether a Privacy Impact Assessment (PIA), a Privacy Act system of records notice (SORN), and/or other related privacy documents are required. The responses to the IPA will provide a foundation for determining if either a PIA or SORN or both will be required, and will also help to identify any policy concerns.

The IPA incorporates the matters previously addressed in the Department's Personally Identifiable Information (PII) Survey, and thus replaces the survey.

When should an IPA be completed?

An IPA should be completed for all information collection activities, whether the system is electronic or contains only records in paper form, and should be completed before commencement of any testing or pilot project of an information system or prior to implementing new information collections requests. Additionally, an IPA should be completed any time there is a change to the information system or collection to determine whether there are any privacy issues as a result of such a change.

Who should complete the IPA?

The IPA should be written and reviewed by a combination of the component's (e.g., Privacy Act Officer, System Owner, Project Leaders, Paperwork Reduction Act Compliance Officers), and the program-specific office responsible for the system, project or information collections.

How is the IPA related to the Capital Planning, Certification and Accreditation, and the Paperwork Reduction Act process?

Upon completion and approval of the IPA by the Privacy Officer the official document may be uploaded into the C&A tool, and provided as part of the IT Capital Planning, and Paperwork Reduction Act package as validation of the completed evaluation. The completed IPA demonstrates that the program components have consciously considered privacy and related requirements as part of the overall information activities. For an IT system that does not require a C&A, such as a minor application that runs on a system that does require a C&A, an IPA still should be completed to determine if other related privacy documentation are required for that system or project.

Where should the completed IPA be sent?

A copy of the completed IPA should be sent to the Office of Privacy Project Leads for review. The Privacy Officer will review the IPA and determine what additional privacy documentation is required, and then will advise the Program component accordingly.

Initial Privacy Assessment

INFORMATION ABOUT THE SYSTEM OR PROJECT

Date Submitted for Review: February 12, 2018

Project Name/Acronym: Application for displacement/relocation/temporary relocation assistance for persons displaced by, or temporarily relocated for, certain HUD programs.

System Owner/Contact information: Office of Affordable Housing

Project Leader/Contact Information: Christian L. Christoffers, Relocation Specialist, Office of Affordable Housing, 451 7th St., SW, RM 7162, Washington, D.C. 20410. Phone: (202) 402-3282. Email: Christian.L.Christoffers@hud.gov

Which of the following describes the type of records in the system:

- Paper-Only
- Combination of Paper and Electronic
- System
- Other:** Please describe below the type of project or system, including paper based Privacy Act System of Records, Rules, or Technologies'. Also, indicate whether this is a revision/update for an existing system or project.

Paper forms and paper records are used and HUD as needed for compliance requirements. Documentation is submitted to HUD by the Grantee through onsite observance, secure email or hard copy paper copies via US Postal Service or courier.

Note: For this form purpose, there is no distinction made between technologies/systems managed by contractors. All technologies/systems should be initially reviewed for potential privacy impact.

Section I: The Entire IPA (Sections I and II) Should be Completed for New Systems or Projects. If this is an Existing System or Project Skip to Section II. Unless requested by the Office of Privacy, this section should not be completed for an existing System or Project.

Question 1: Provide a general description of the system of Project. The following questions are intended to define the scope of the information in the system, information collection, or project, specifically the nature of the information and the sources from which it is obtained.

- a. From whom is the information collected (i.e., government employees, contractors, or consultants, state, local government entities, or general public)?

Information collection activity is not a physical information technology system. Forms are used to reimburse persons displaced from HUD funded projects, such as members of the general public (families, individuals), business, nonprofit organizations and farms.

- b. What is the functionality of the system, information collection, or project and the purpose that the records and/or system serve?

The information collection request (ICR) supports HUD funded projects involving the acquisition of real property or the displacement of persons as a direct result of acquisition. Subsequently, rehabilitation or demolition projects are subject to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (URA). HUD has developed optional relocation claim forms which may be used by Grantees, but are not required to submit claims for relocation payments in connection with HUD funded programs or projects. Claims for relocation assistance are not submitted to HUD. Any claims for relocation assistance are submitted to the HUD Grantee or funding recipient carrying out the HUD funded program or project. HUD does not mandate the use of these forms nor does HUD collect or maintain these or any other claim forms which are submitted to HUD Grantees or funding recipients. HUD may occasionally review the documentation as part of monitoring efforts to ensure compliance with URA requirements.

- c. How is information transmitted to and from the system, information

collection, or project?

This is not an IT system. Person/businesses submitting a claim provide the information to the Grantees in paper form via UP Postal Service, in-person delivery, electronically via email, or courier. During monitoring efforts by HUD, the original paper forms or copies of the paper forms may be reviewed for the information they contain to determine if the information collected is adequate to meet the requirements of the URA.

d. What are the interconnections with other systems or projects?

N/A. There are not system interfaces, this is not an IT system.

QUESTION 2: What is the Status of system, information collection, or project

a. If this is a new system, information collection, or project, specify the expected production date.

This is not a new project; it is an extension of a currently approved information collection project. This project became applicable to HUD's grantees and funding recipients by government-wide final rule on March 2, 1989.

b. If an existing system, information collection, or project, specify the date of production.

For the existing project, Form HUD 40030 is dated 10/2008; Form HUD 40054 is dated 4/2005; Form HUD 40055 is dated 4/2005; Form HUD 40056 is dated 4/2005; Form HUD 40057 is dated 2/2005; Form HUD 40058 is dated 7/2006; Form HUD 40061 is dated 4/2005; Form HUD 40072 is dated 4/2005.

The form dates will be revised and updated once the ICR package is approved by OMB.

QUESTION 3: Does this system, information collection, or project collect personal identifiers/sensitive information

YES NO **Does the system, information collection, or project collect personal/sensitive information?** (e.g. name, address, personal email address, gender/sex, race/ethnicity, income/financial data, employment history, medical history, Social Security Number, Tax Identification Number, Employee Identification Number, FHA Case Number). Includes PII that may be part of a registration process?

If yes, specific data sets collected or provided, and the legal authorities, arrangement, and/or agreement authorize the collection of information (i.e. must include authorities that cover all information collection activities, including Social Security Numbers)?

This information is being under the authority of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and the authority of the Housing and Community Development Act of 1987, 42 U.S.C. 3543, the U.S. Housing Act of 1937, as amended, 42 U.S.C. 1437 et seq., and the Housing and Community Development Act of 1981, P.L. 97-35, 85 stat. 34, 408. The authority for collecting social security numbers is not required for this package. For residential moves, examples of the types of information collected on the forms-HUD 40030; HUD 40054; HUD 40056; HUD 40057; HUD 40058; HUD 40061; HUD 40072, include names; addresses; income; moving costs expenses, storage costs, insurance; verification of citizenship; how much paid for rent and utilities; number of rooms/bedrooms in a dwelling; distances from employment, schools, or religious facilities.. For businesses, Form HUD-40055, examples of information collected includes name of business, address and type of operation, ownership, expenses for moving, connection to nearby utilities; and citizenship. The information collected helps in calculating and determining the appropriate type of payments due to the displaced individual, family, business, farm, or nongovernmental organization.

QUESTION 4: Does the information about individuals identify particular individuals (i.e., is the information linked or linkable to specific individuals, often referred to as personally identifiable information?)

Yes. The information is only used to identify the individual, family, business, farm, or nongovernmental organization that should receive payments for costs associated with moving to another dwelling or business site. Information collected at the business level (the business name/company) does not constitute personal information.

QUESTION 5: What type of Notice(s) are provided to the individual on the scope of information collected, the opportunity to consent to uses of said information, the opportunity to decline to provide information. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.)

- a. Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.) If notice was not published, why not?

Privacy Act Notices are provided on all forms that collect personal information at the individual level. When the HUD forms are not used the Grantees are expected to still read the Privacy statement notice at the point the information is being collected. There is also a Privacy Act System of Records notice for this project that was updated on December 14, 2012. This link provides access to that notice: http://portal.hud.gov/hudportal/documents/huddoc?id=CPD_DGHR01.pdf

- b. Do individuals have an opportunity and/or right to decline to provide information?

Yes.

- c. Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?

Yes, for all forms that collect personal information, the individuals consent to particular uses made of the information under

the Privacy Act Notice statement to the individual. If a person does not agree to how the information will be used the person is given the opportunity to not provide the information.

QUESTION 6: Is there a Certification & Accreditation record for your system? (This question does not apply to Information Collection Requests)

No.

Specify below the systems categorization. If not available identify the FISMA-reported system whose Certification and Accreditation covers this system.

This is not an information technology system.

Confidentiality	<input type="checkbox"/>	Low	<input type="checkbox"/>	Moderate	<input type="checkbox"/>	High	<input type="checkbox"/>	Undefined
Integrity	<input type="checkbox"/>	Low	<input type="checkbox"/>	Moderate	<input type="checkbox"/>	High	<input type="checkbox"/>	Undefined
Availability	<input type="checkbox"/>	Low	<input type="checkbox"/>	Moderate	<input type="checkbox"/>	High	<input type="checkbox"/>	Undefined

SECTION II - The Entire IPA should be completed for New Systems or Projects. If this is an Existing System or Project Complete Only Complete This Section.

QUESTION 1: When was the system, information collection, or project developed?

The project became applicable to HUD’s grantees and funding recipients by government-wide final rule on March 2, 1989.

QUESTION 2: If an existing system, information collection, or project, has the system or project undergone any changes since April 17, 2003?

No.

QUESTION 3: If an existing system, information collection, or project, has the system or project, explain the changes the system or project will be undergoing as part of this renewal/update process.

N/A. There are no changes occurring for this project.

QUESTION 4: Do the changes to the system, information collection, or project involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?

N/A. There are no changes to the information collection package.

QUESTION 5: Please indicate if any of the following changes to the system or project have occurred: (Mark all boxes that apply.)

- A conversion from paper-based records to an electronic system.
- A change from information in a format that is anonymous or non-identifiable to a format that is identifiable to particular individuals.
- A new use of an IT system, including application of a new technology that changes how information in identifiable form is managed. (For example, a change that would create a more open environment and /or avenue for exposure of data that previously did not exist.)
- A change that results in information in identifiable form being merged, centralized, or matched with other databases.
- A new method of authenticating the use of an access to information in the identifiable form by members of the public.
- A systematic incorporation of databases of information in identifiable form purchased or obtained from commercial or public sources.
- A new interagency use of shared agency function that results in new uses or exchanges of information in identifiable form.

- A change that results in a new use of disclosure of information in identifiable form.
- A change that results in new items of information in identifiable form being added into the system.

QUESTION 6: Does a PIA for the system or project already exist? If yes, please provide a copy of the notice as an appendix.

No. This project does not require a PIA. The IPA is sufficient at this time.

DOCUMENT ENDORSMENT

DATE REVIEWED:
PRIVACY REVIEWING OFFICIALS NAME:

The IPA is “not” an official document until all signatures are obtained for this page.

By signing below the Program Office or Support Office 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 OR PROJECT OWNER	Date
<< INSERT NAME/TITLE >>	
<<INSERT PROGRAM OFFICE >>	

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

CHIEF PRIVACY OFFICER,	Date
<<INSERT NAME >>	
Office of the Chief Information Officer	
U. S. Department of Housing and Urban Development	

