U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

INITIAL PRIVACY ASSESSMENT (IPA)

Resident Opportunity & Self-Sufficiency (ROSS) Program

Office of Public Housing Investments

Instruction & Template

November 17 2016

INITIAL PRIVACY ASSESSMENT (IPA)

The IPA is a compliance form developed by the Privacy Branch to identify the use of Personally Identifiable Information (PII) across the Department. The IPA is the first step in the PII verification process, which focuses on the following areas of inquiry:

- Purpose for the information,
- Type of information,
- Sensitivity of the information,
- Use of the information,
- And the risk to the information.

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 or a System of Record Notice (SORN) is required under the Privacy Act of 1974, as amended.

Please complete this form and send it to your program Privacy Liaison Officer (PLO). If you do not have a program Privacy Liaison Officer, please send the IPA to the HUD Privacy Branch:

<div align="center">

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

privacy@hud.gov

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Upon receipt from your program PLO, the HUD Privacy Branch will review this form. If a PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return.

INITIAL PRIVACY ASSESSMENT (IPA)

SUMMARY INFORMATION

Project or Program Name:	**Resident Opportunity & Self-Sufficiency Program**		
Program:			
CSAM Name (if applicable):	Click here to enter text.	**CSAM Number (if applicable):**	Click here to enter text.
Type of Project or Program:		**Project or program status:**	
Date first developed:	Click here to enter a date.	**Pilot launch date:**	Click here to enter a date.
Date of last IPA update:	Click here to enter a date.	**Pilot end date:**	Click here to enter a date.
ATO Status (if applicable)		**ATO expiration date (if applicable):**	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Click here to enter text.		
Office:	Click here to enter text.	**Title:**	Click here to enter text.
Phone:	Click here to enter text.	**Email:**	Click here to enter text.

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	**Email:**	Click here to enter text.

SPECIFIC IPA QUESTIONS

1. **Reason for submitting the IPA:**	

This is an updated IPA for HUD's Resident & Opportunity Self-Sufficiency (ROSS) Program, which is set to expire on June 30, 2018. This collection package is a revision of a previously approved collection. This revision is necessary in order to submit the revisions to the 52768 (ROSS SERVICE COORDINATORS – FUNDING REQUEST). The revisions include adding salary comparability information onto the form, combining portions of the HUD-52769 with the HUD-52768 form, and simplifying the format of how the applicants report their match. Other revisions to the HUD-52768 include eliminating redundancy and making the application form electronic on grants.gov. In addition, forms that were previously under the ROSS PRA that will not be needed in future NOFAs are being removed under this PRA. Those forms include the HUD-52754 and the HUD-52769. The burden hours have been reduced from a total of 2,200 hours to a total of 1607.3 because of the effort to streamline the application process. Additional details will be provided in future Notices of Funding Availability for completing this form.

Please provide a general description of the project and its purpose *in a way a non-technical person could understand. If this is an updated IPA, please describe what changes and/or upgrades that are triggering the update to this IPA. If this is a renewal please state whether or not there were any changes to the project, program, or system since the last version.*

2. **Does this system employ any of the following technologies?** *If you are using any of these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.*	☐ Social Media
	☐ Web portal[2] (e.g., SharePoint)
	☐ Contact Lists
	☐ Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD
	☒ None of these

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[2] Informational and collaboration-based portals in operation at HUD and its programs that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

3. From whom does the Project or Program collect, maintain, use, or disseminate information? *Please check all that apply.*	☒ This program does not collect any personally identifiable information[3] ☐ Members of the public ☐ HUD employees/contractors (list programs): ☐ Contractors working on behalf of HUD ☐ Employees of other federal agencies ☐ Other (e.g. business entity)

4. What specific information about individuals is collected, generated or retained?
Please provide a specific description of information that is collected, generated, or retained (such as names, addresses, emails, etc.) for each category of individuals.

4(a) Does the project, program, or system retrieve information from the system about a U.S. Citizen or lawfully admitted permanent resident aliens by a personal identifier?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
4(b) Does the project, program, or system have an existing System of Records Notice (SORN) that has already been published in the Federal Register that covers the information collected?	☒ No. Please continue to next question. ☐ Yes. If yes, provide the system name and number, as well as the Federal Register citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system
4(c)Has the project, program, or system undergone any significant changes since the SORN?	☒ No. Please continue to next question. ☐ Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	Click here to enter text.
4(f) If yes, please describe the uses of the SSNs within the project, program, or	Click here to enter text.

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[3] HUD defines personal information as "Personally Identifiable Information" or PII, which is any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this IPA, SPII and PII are treated the same.

system:	
4(g) If this project, program, or system is an information 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 next question. ☐ Yes. If a log kept of communication traffic, please answer the following question.
4(h) If header or payload data[4] is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	[ ] Please describe applicable information sharing governance in place:
7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all HUD personnel?	☒ No. ☐ Yes. If yes, please list:
8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?	☒ No. What steps will be taken to develop and maintain the accounting: ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[5]	☐ Unknown.

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[4] Header: Information that is placed before the actual data. The header normally contains a small number of bytes of control information, which is used to communicate important facts about the data that the message contains and how it is to be interpreted and used. It serves as the communication and control link between protocol elements on different devices.

Payload data: The actual data to be transmitted, often called the payload of the message (metaphorically borrowing a term from the space industry!) Most messages contain some data of one form or another, but some actually contain none: they are used only for control and communication purposes. For example, these may be used to set up or terminate a logical connection before data is sent.

	☒ No. ☐ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☐ Moderate ☐ High Integrity: ☐ Low ☐ Moderate ☐ High Availability: ☐ Low ☐ Moderate ☐ High

INITIAL PRIVACY ASSESSMENT REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Click here to enter text.
Date submitted to Program Privacy Office:	Click here to enter a date.
Date submitted to HUD Privacy Branch:	Click here to enter a date.
Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Click here to enter text.
Date approved by HUD Privacy Branch:	Click here to enter a date.
IPA Expiration Date:	Click here to enter a date.

DESIGNATION

Privacy Sensitive System:		If "no" IPA adjudication is complete.
Category of System:		

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[5] FIPS 199 is the Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems and is used to establish security categories of information systems.

	If "other" is selected, please describe: Click here to enter text.
Determination:	☐ IPA sufficient at this time.
	☐ Privacy compliance documentation determination in progress.
	☐ New information sharing arrangement is required.
	☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies.
	☐ Privacy Act Statement required.
	☐ Privacy Impact Assessment (PIA) required.
	☐ System of Records Notice (SORN) required.
	☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.
	☐ A Records Schedule may be required. Contact your program Records Officer.
PIA:	
	If covered by existing PIA, please list: Click here to enter text.
SORN:	
	If covered by existing SORN, please list: Click here to enter text.
HUD Privacy Branch Comments: *Please describe rationale for privacy compliance determination above.*	
Click here to enter text.	