

# PRIVACY IMPACT ASSESSMENT (PIA)

**Prescribing Authority:** Public Law 107-347, Section 208(b). Complete this form for Department of Housing and Urban Development (HUD) information systems or electronic collections (referred to as "electronic collections" for the purpose of this form) of information that collect, maintain, use, and / or disseminate personally identifiable information (PII) about members of the public, Federal employees, and contractors. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to the system. Please be sure to use plain language and be as concise as possible.

For further information and instructions on how to fill out the PIA, please see the PIA Reference Guide.

HUD's PIAs describe: (1) the legal authority that permits the collection of information; (2) the specific type of information used by the system; (3) how and why the system uses the information; (4) whether the system provides notice to individuals that their information is used by the system; (5) the length of time the system retains information; (6) whether and with whom the system disseminates information; (7) procedures individuals may use to access or amend information used by the system; and (8) physical, technical, and administrative safeguards applied to the system to secure the information.

## 1. HUD INFORMATION SYSTEM:

## 2. HUD DIVISION NAME:

## 3. CSAM ID:

### Section 1: PII Description Summary (For Public Release)

#### a. **The PII is:** *(Check all that apply)*

From members of the general public

From Federal employees and / or Federal contractors

From vendors

From a third-party source

Not Collected (Please proceed to Section 4)

Other (Please specify in the box below)

#### b. **The PII is in a / an:** *(Check one)*

New HUD information system

Existing HUD information system

Significantly modified HUD information system

*(if selected, please describe the modification in the box below)*

New collection

Existing collection

#### c. **Describe the purpose of this HUD information system or project, including the types of personal information collected in the system.**

#### d. **Why is the PII collected and / or what is the intended use of the PII?** *(e.g. verification, identification, authentication, data matching, mission-related use, administrative use)*

**e. Do individuals have the opportunity to object to the collection of their PII?** **Yes** **No**

If “Yes,” describe the method by which individuals can object to the PII collection.

If “No,” state the reason why individuals cannot object to the PII collection.

**f. Do individuals have the opportunity to consent to the specific uses of their PII?** **Yes** **No**

If “Yes,” describe the method by which individuals can give or withhold their consent.

If “No,” state the reason why individuals cannot give or withhold their consent.

**g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and / or a Privacy Advisory must be provided. (Check as appropriate and provide the actual wording)**

Privacy Act Statement

Privacy Advisory

Not Applicable

**h. With whom will the PII be shared through data exchange, both within your HUD Division and outside your Division? (Check all that apply)**

Within the HUD Office / Division

Other HUD Office(s) / Division(s)

Other federal agencies

State & local agencies

Contractors (Include name of contractor and describe the language in the contract that safeguards PII in the box below.)

Other

**i. Source(s) of the PII collected is / are: (Check all that apply & list all information systems if applicable)**

Individuals

Databases

Existing HUD information systems

Publicly available data (e.g., obtained from internet, news feeds, court records)

Other Federal information systems

**j. How will the information be collected? (Check all that apply & list all Official Form Numbers if applicable)**

Email

Telephone interview

Face-to-face contact

Website / e-form

Fax

Paper

Information sharing /system-to-system

Other (if selected, enter information in the box )

Official form

**k. Does this HUD information system or project require a Privacy Act System of Records Notice (SORN)?**

A SORN is required if the information system or project contains information about U.S. citizens or lawful permanent U.S. residents that is retrieved by name of another unique identifier. PIA and Privacy Act SORN information must be consistent.

**Yes No**

If "Yes," enter SORN System Identifier:

If a SORN has not yet been published in the Federal Register, enter date of submission for approval.

If "No," explain why the SORN is not required.

**l. What is the National Archive and Records Administration (NARA) approved, pending, or general records schedule (GRS) disposition authority for the system or for the records maintained in the system?**

*(Please consult Office of Records Management to assure that the following information is accurate)*

- (1) NARA Job Number or GRS Authority:
- (2) If pending, provide the date the SF-115 was submitted to NARA:
- (3) Retention instructions:

**m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statute or Executive Order.**

**n. Does this information system or project have an active and approved Office of Management and Budget (OMB) Control Number?**

This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

**Yes No Pending**

If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.

If "No," explain why OMB approval is not required in accordance with proper HUD authority.

If "Pending," provide the date for the 60 and / or 30 day notice and the Federal Register citation.

## Section 2: PII Risk Review

**a. What PII will be collected or maintained on the information system or project:** *(Check all that apply)*

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Age  | <input type="checkbox"/> Employment Status, History, or Information (e.g., title, position) | <input type="checkbox"/> Phone Number(s)   |
| <input type="checkbox"/> Alias  | <input type="checkbox"/> Fax Number   | <input type="checkbox"/> Photographic Identifiers (e.g., photograph, video, x-ray) |
| <input type="checkbox"/> Audio Recordings   | <input type="checkbox"/> Financial Information (e.g., credit report, account number)        | <input type="checkbox"/> Place of Birth  |
| <input type="checkbox"/> Biometrical Identifiers (e.g., fingerprint(s), iris image) | <input type="checkbox"/> Foreign activities   | <input type="checkbox"/> Protected Health Information (PHI)                        |
| <input type="checkbox"/> Certificates (e.g., birth, death, marriage)                | <input type="checkbox"/> Full Name  | <input type="checkbox"/> Race / Ethnicity  |
| <input type="checkbox"/> Citizenship(s)   | <input type="checkbox"/> Gender   | <input type="checkbox"/> Religion  |
| <input type="checkbox"/> Credit Card Number   | <input type="checkbox"/> Geolocation Information  | <input type="checkbox"/> Salary  |
| <input type="checkbox"/> Criminal records information                               | <input type="checkbox"/> Home Address   | <input type="checkbox"/> Sex   |
| <input type="checkbox"/> Date of Birth  | <input type="checkbox"/> Internet Cookie Containing PII                                     | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form)        |
| <input type="checkbox"/> Device identifiers (e.g., mobile devices)                  | <input type="checkbox"/> Investigation Report or Database                                   | <input type="checkbox"/> Taxpayer ID   |
| <input type="checkbox"/> Drivers' License / State ID Number                         | <input type="checkbox"/> IP / MAC Address   | <input type="checkbox"/> User ID   |
| <input type="checkbox"/> Education Records  | <input type="checkbox"/> Legal Documents, Records   | <input type="checkbox"/> Vehicle Identifiers (e.g., license plate)                 |
| <input type="checkbox"/> Email Address(es)  | <input type="checkbox"/> Marital Status   | <input type="checkbox"/> Web uniform resource locator(s)                           |
| <input type="checkbox"/> Employee Identification Number                             | <input type="checkbox"/> Military status or other information                               | <input type="checkbox"/> Work Address  |
|   | <input type="checkbox"/> Mother's Maiden Name   | <input type="checkbox"/> Other (if selected, please enter the information below)   |
|   | <input type="checkbox"/> Passport Information   |  |

**b. If the SSN is collected, please list the proper HUD authority to do so.**

### Section 3: PII Security Measures

**a. How will the PII be secured?** (Include any physical, administrative, technical controls, and other controls place)

(1) Physical Controls. *(Check all that apply)*

Cipher locks  
Combination locks  
Key cards  
Security Guards

Closed Circuit TV  
Identification badges  
Safes  
If Other, enter the information in the box below

(2) Administrative Controls. *(Check all that apply)*

Backups Secured Off-Site  
Encryption of Backups  
Methods to Ensure Only Authorized  
Personnel Access to PII

Periodic Security Audits  
Regular Monitoring of Users' Security Practices  
If Other, enter the information in the box below

(3) Technical Controls *(Check all that apply)*

Biometrics  
Encryption of Data at Rest  
Firewall  
Role-Based Access Controls  
Virtual Private Network (VPN)  
Encryption of Data in Transit  
Used Only for Privileged (Elevated Roles)

Public Key Infrastructure Certificates  
External Certificate Authority Certificates  
Least Privilege Access  
User Identification and Password  
PIV Card  
Intrusion Detection System (IDS)  
If Other, enter the information in the box below

**b. What additional measures / safeguards have been put in place to address privacy risks for this information system or electronic collection?**

**c. Where is PII stored associated with the system?** *(Check all that apply)*

On a centralized HUD server  
 On individual HUD laptops  
 In e-mails

In hard copy documents  
 Other (Please specify in the box below)

**Please specify selection(s) made.**

**Indicate the assessment and authorization status:**

Authorization to Operate (ATO)  
ATO with Conditions  
Denial of Authorization to Operate (DATO) Interim  
Authorization to Test (ATT)

Date Granted:  
Date Granted:  
Date Granted:  
Date Granted:

## Section 4: Review and Approval Signatures

Completion of the PIA requires coordination by the System Manager, Information System Security Officer, Privacy Liaison Officer, Record Liaison Officer and HUD Records Officer **BEFORE** it is sent to the HUD Privacy Office. HUD Privacy will review/forward to Senior Agency Official for Privacy for review/signature.

**System Manager:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**Information System Security Officer:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**Records Management Liaison Officer:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**Privacy Liaison Officer:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**HUD Records Officer:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**HUD Chief Privacy Officer:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**Senior Agency Official for Privacy or Designee:**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

**PIA NUMBER:**

**PIA APPROVAL DATE**

*Once completed, only Section 1 of this PIA will be published to HUD's public website.*