Department of Housing and Urban Development (HUD) Privacy Impact Assessment (PIA)

Prescribing Authority: Public Law 107-347, Section 208(b). Complete this form for Department of Housing and Urban Development 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.

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.

Note: Program Offices utilizing Shared Drive and SharePoint locations to store information such as PII are required to conduct a PIA. Program Offices completing a PIA for PII storage in the HUD Shared Drive will use will use either **CSAM ID P207, P209, P212 or 1098** whereas the PIA for PII storage in SharePoint will use the **CSAM ID D100**. After completion of all required information in the PIA, PIA are required to be routed to the Shared Drive Administrator and/or SharePoint Administrator for signature approval in addition to all the required signatures.

For further information and instructions on how to fill out the PIA, please see the PIA Reference Guide. Please submit all completed PIAs using the submission feature located at the bottom of page 7.

1. <u>**HUD INFORMATION SYSTEM**</u>:
2. <u>**HUD DIVISION NAME:**</u>
3. <u>**CSAM ID:**</u>

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

No PII (Fill out 1c & 1l, then go 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 within 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)*

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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, is a Privacy Act Statement (PAS) and / or a Privacy Advisory provided?** *(Please provide the **actual wording** in the box below and check as appropriate)*

　☐ 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)*

　　☐ Encrypted 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

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

A SORN is required if the information system 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 statue or Executive Order.

n. Does this Information System or E-Collection 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)*

☐ Age
☐ Alias
☐ Audio Recordings
☐ Biometrical Identifiers (e.g., fingerprint(s), iris image)
☐ Certificates (e.g., birth, death, marriage)
☐ Citizenship(s)
☐ Credit Card Number
☐ Criminal records information
☐ Date of Birth
☐ Device identifiers (e.g., mobile devices)
☐ Drivers' License / State ID Number
☐ Education Records
☐ Email Address(es)
☐ Employee Identification Number

☐ Employment Status, History, or Information (e.g., title, position)
☐ Fax Number
☐ Financial Information (e.g., credit report, account number)
☐ Foreign activities
☐ Full Name
☐ Gender
☐ Geolocation Information
☐ Home Address
☐ Internet Cookie Containing PII
☐ Investigation Report or Database
☐ IP / MAC Address
☐ Legal Documents, Records
☐ Marital Status
☐ Military status or other information
☐ Mother's Maiden Name
☐ Passport Information

☐ Phone Number(s)
☐ Photographic Identifiers (e.g., photograph, video, x-ray)
☐ Place of Birth
☐ Protected Health Information
☐ Race / Ethnicity
☐ Religion
☐ Salary
☐ Sex
☐ Social Security Number (SSN) (Full or in any form)
☐ Taxpayer ID
☐ User ID
☐ Vehicle Identifiers (e.g., license plate)
☐ Web uniform resource locator(s)
☐ Work Address
☐ Other (if selected, please enter the information below)

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? (Input N/A if not applicable)

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

☐ On a centralized HUD server

☐ On individual HUD laptops

☐ In e-mails

Please specify selection(s) made.

☐ In hard copy documents

☐ Other (Please specify in the box below)

d. 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:

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Section 4: Review and Approval Signatures

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

Signatures for PII Storage in Shared Drive and Share Point PIAs:
*If PIA is regarding PII storage on Shared Drive, PIA must be routed to the Shared Drive Administrator for signature.
***If PIA is regarding PII storage on SharePoint, PIA must be routed to both the Shared Drive **AND** SharePoint Administrators for signature.*

System Manager (*or Shared Drive Administrator if applicable**):
Name:

Signature: _____

SharePoint Administrator (if applicable)**:

Name:

Signature: _____

Information System Security Officer:
Name:

Signature: _____

Records Management Liaison Officer:
Name:

Signature: _____

Privacy Liaison Officer:
Name:

Signature: _____

HUD Records Officer:
Name:

Signature: _____

*Once all required signatures are collected on this page, please send PIA to the HUD Privacy Office via **the privacy submission button on page 7.***

HUD Privacy Office will route the PIA to Chief Privacy Office and Senior Agency Official for Privacy for signatures.

HUD Chief Privacy Officer:
Name:

Signature: _____

Senior Agency Official for Privacy:
Name:

Signature: _____

PIA NUMBER: _____

PIA APPROVAL DATE: _____

Once completed, enkem\'j g'dgnqy 'dnwg'dwwqp'\q'go cki\'j g'eqo rngvg'eqr{'\q'\j g'Rtkxce{'ipdqz (privacy@hud.gov)0' Pqvg'\j cv'only Section 1 of this PIA will be published to HUD's public website.

Please check the boxes below that are relevant to your Annual Certification and PIA process.

This is a new PIA

This is a revision for an existing PIA

This is an annual certification for an existing PIA

This is a correction for an existing publication

This is a Notification of Rescindment for an existing PIA