

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

Enterprise Income Verification (EIV) System

Privacy Impact Assessment

September 2009

Document Endorsement

I have carefully assessed the Privacy Impact Assessment (PIA) for the **Enterprise Income Verification system**. This document has been completed in accordance with the requirement set forth by the [E-Government Act of 2002](#) and [OMB Memorandum 03-22](#) which requires that "Privacy Impact Assessments" (PIAs) be conducted for all new and/ or significantly altered IT Systems, and Information Collection Requests.

ENDORSEMENT SECTION

Please check the appropriate statement.

- THE DOCUMENT IS ACCEPTED.**
 THE DOCUMENT IS ACCEPTED PENDING THE CHANGES NOTED.
 THE DOCUMENT IS NOT ACCEPTED.

Based on our authority and judgment, the data captured in this document is current and accurate.

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APPROVED/ FINAL

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
PRIVACY IMPACT ASSESSMENT (PIA) FOR:
“ENTERPRISE INCOME VERIFICATION”
(OMB Unique Identifier 02500010601000000301093 and PCAS # 01667990)
September 2009**

SECTION 1: BACKGROUND

Importance of Privacy Protection – Legislative Mandates:

HUD is responsible for ensuring the privacy and confidentiality of the information it collects on members of the public, beneficiaries of HUD programs, business partners, and its own employees. These people have a right to expect that HUD will collect, maintain, use, and disseminate identifiable personal information only as authorized by law and as necessary to carry out agency responsibilities.

The information HUD collects is protected by the following legislation and regulations:

- [Privacy Act of 1974, as amended](http://www.usdoj.gov/foia/privstat.htm) affords individuals the right to privacy in records that are maintained and used by Federal agencies. (See <http://www.usdoj.gov/foia/privstat.htm>; see also [HUD Handbook 1325.1 at www.hudclips.org](http://www.hudclips.org));
- Computer Matching and Privacy Protection Act of 1988, is an amendment to the Privacy Act that specifies the conditions under which private information may (or may not) be shared among government agencies. (See <http://www.usdoj.gov/foia/privstat.htm>);
- [Freedom of Information Act of 1966, as amended](http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) (http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm) provides for the disclosure of information maintained by Federal agencies to the public, while allowing limited protections for privacy. See also [HUD’s Freedom of Information Act Handbook \(HUD Handbook 1327.1 at www.hudclips.org\)](http://www.hudclips.org));
- [E-Government Act of 2002](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf) requires Federal agencies to conduct Privacy Impact Assessments (PIAs) on its electronic systems. (See http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf; see also the summary of the E-Government Act at http://www.whitehouse.gov/omb/egov/pres_state2.htm);
- [Federal Information Security Management Act of 2002](http://uscode.house.gov/search/criteria.php) (which superseded the Computer Security Act of 1987) provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets, etc. See also the codified version of Information Security regulations at [Title 44 U.S. Code chapter 35 subchapter II](http://uscode.house.gov/search/criteria.php) (<http://uscode.house.gov/search/criteria.php>); and
- [OMB Circular A-130, Management of Federal Information Resources, Appendix I](http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf) (http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf) defines Federal Agency responsibilities for maintaining records about individuals.

Access to personally identifiable information will be restricted to those staff that have a need to access the data to carry out their duties and they will be held accountable for ensuring privacy and confidentiality of the data.

What is the Privacy Impact Assessment (PIA) Process?

The Privacy Impact Assessment (PIA) is a process that evaluates issues related to the privacy of personally identifiable information in electronic systems. See background on PIAs and the 7 questions that need to be answered, at: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

Personally identifiable information is defined as information that actually identifies an individual, e.g., name, address, social security number (SSN), or identifying number or code; or other personal/ sensitive information such as race, marital status, financial information, home telephone number, personal e-mail address, date of birth, etc. Of particular concern is the combination of multiple identifying elements. For example, knowing name + SSN + birth date + financial information would pose more risk to privacy than just name + SSN alone.

The PIA:

- Identifies the type of personally identifiable information in the system (including any ability to combine multiple identifying elements on an individual);
- Identifies who has access to that information (whether full access or limited access rights); and
- Describes the administrative controls that ensure that only information that is necessary and relevant to HUD's mission is included.

Who Completes the PIA?

Both the program area system owner and IT project leader work together to complete the PIA. The system owner describes what personal data types are collected, how the data is used, and who has access to the personal data. The IT project leader describes whether technical implementation of the system owner's requirements presents any risks to privacy, and what controls are in place to restrict access of personally identifiable information.

When is a Privacy Impact Assessment (PIA) Required?

- 1. New Systems:** Any new system that will contain personal information on members of the public requires a PIA, per OMB requirements (this covers both major and non-major systems).
- 2. Existing Systems:** Where there are significant modifications involving personal information on members of the public, or where significant changes have been made to the system that may create a new privacy risk, a PIA is required.
- 3. Information Collection Requests, per the Paperwork Reduction Act (PRA):** Agencies must obtain OMB approval for new information collections from ten or more members of the public. If the information collection is both a new collection and automated, then a PIA is required.

Privacy Act. The [Privacy Act of 1974](http://www.usdoj.gov/foia/privstat.htm), as amended (<http://www.usdoj.gov/foia/privstat.htm>) requires that agencies publish a Federal Register Notice for public comment on any intended information collection. Privacy Act Systems of Records are created when information pertaining to an individual is collected and maintained by the Department, and is retrieved by the name of the individual or by some other identifying number, symbol, or other identifying particular assigned to an individual. The [E-Government Act of 2002](#) requires PIAs for electronic systems as well as information collection requests that are automated. So, there is a relationship between the new PIA requirement (when automation is involved) and the long-standing Privacy Act System of Records Notices (for both paper-based and automated records that are of a private nature). For additional information, contact the Departmental Privacy Act Officer in the Office of the Chief Information Officer.

Publication of PIA Summary. The E-Government Act of 2002 requires that the analysis and determinations resulting from the PIA be made publicly available. The Privacy Advocate in HUD's Office of the Chief Information Officer (OCIO) is responsible for publishing the PIA summary on HUD's web site. See: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

SECTION 2 – COMPLETING A PRIVACY IMPACT ASSESSMENT

Program Area: Office of Public and Indian Housing – Real Estate Assessment Center (REAC)

Subject matter experts in the program areas: Nicole Faison, Program Advisor, Office of Public and Indian Housing (202) 708-0744; Gail Williamson, Director, Housing Assistance Policy Division, (202) 402-2473

Program area managers: Nicole Faison, Program Advisor, Office of Public and Indian Housing (202) 402-4267; Gail Williamson, Director, Housing Assistance Policy Division, (202) 402-2473.

For IT Systems:

- **Name of system:** Enterprise Income Verification (EIV)
- **PCAS #:** 01667990
- **OMB Unique Project Identifier #:** 02500010601000000301093

For Information Collection Requests:

- **Name of Information Collection Request:** PIH Debts Owed to PHAs & Terminations
- **OMB Control #:** Pending OMB approval

Question 1: Provide a brief description of what personal information is collected.

Each year, HUD's Office of Public and Indian Housing (PIH) and the Office of Multifamily (MF) Housing provide rental housing assistance (subsidies) for more than 4 million families and 1.3 million families, respectively. The Enterprise Income Verification (EIV) system is a component of the Rental Housing Integrity Improvement Project (RHIIP). RHIIP is a priority Secretarial initiative designed to reduce income and rent errors and improper payments in the administration of Public Housing, Section 8 Housing Choice Voucher, and Multifamily (MF) Housing programs. To ensure that rental subsidies are paid on the behalf of eligible families and are of the correct amount, the income of each household receiving or applying for rental housing assistance must be verified. It is also important to assure that the identities of recipients of rental housing assistance are correct and valid and that there is no duplication of benefits.

A PIA was conducted for the EIV system in November 2004, April 2005, September 2005, March 2006, November 2006, February 2008, and September 2009. The purpose of this update is to reflect changes that were made in EIV's management of personal data as it enhances the services it provides to HUD rental housing assistance programs.

EIV is being modified to enable the entry of the following information:

1. If applicable, amount of debt owed by a former tenant to a PHA;
2. If applicable, indication of executed repayment agreement;
3. If applicable, indication of bankruptcy filing;
4. If applicable, the reason for any adverse termination of the family from a federally assisted housing program.

This information will be used by HUD to create a national repository of families that owe a debt to a Public Housing Agency (PHA) and/or have been terminated from a federally assisted housing program. This national repository will be available within the EIV system for all PHAs

to access during the time of application for rental assistance. PHAs will be able to access this information to determine a family's suitability for rental assistance, and avoid providing limited Federal housing assistance to families who either: 1) owe a debt to a PHA; or 2) have previously been unable to comply with HUD program requirements.

In serving PIH and MF Housing program administrators, who use EIV, the EIV system relies on personal identifiers from the Inventory Management System (IMS) and Tenant Rental Assistance Certification System (TRACS), respectively, to facilitate computer matching with the Social Security Administration (SSA) to obtain Social Security and Supplemental Security Income (SS/SSI) benefits and the Department of Health and Human Services' Office of Child Support Enforcement (HHS/OCSE) to obtain quarterly wage and unemployment compensation benefits, employment information (employer name, address and federal employer identification number), and new hires (federal form W-4) information regarding program participants. The aforementioned income information is maintained in the EIV system for HUD intermediaries -- for the public housing and voucher programs, the PHAs, and for the MF Housing program, the owners of properties who have contracted to participate in the MF Housing program, as well as the employees and agents of the owner, and employees of the agents. Strict access controls are in place and use of the system is monitored closely.

If this automated system (or Information Collection Request) involves personally identifiable information, **then mark any of the categories that apply below:**

Personal Identifiers:

X	Name
X	<p>Social Security Number (SSN): The full SSN is disclosed on the following reports:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Income Discrepancy Report in the individual household level, and Detail Report - Deceased Tenants Report - Tenant Data Access Report (SSNs are masked in printed report) - Identity Verification Report - <p><u>MF Housing Reports</u></p> <ul style="list-style-type: none"> - Tenant Data Access Report at the HQ level - Deceased Tenants Report at the HQs, Contract, and Project levels - Identity Verification Report at the Contract, and Project levels <p>The last four digits of the SSN are displayed on the following reports:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Head of Household Summary Report and Income Report - By Reexamination Month - Summary Report and Income Report Detail Report - By Reexamination Month - New Hires Report Summary Report and Detail Report - By Reexamination Month - Failed Verification Report - By Reexamination Month - No Income Report - Multiple Subsidy Report -- Summary Report and Detail Report - New Hires Report - Summary Report and Detail Report

	<p>- Existing Tenant Search</p> <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - Head of Household - Summary Report, Income Report and Income Discrepancy Report - By Contract Number or Project Number and by Re-certification Month – Summary Report, Income Report Detail, - Income Discrepancy report Detail level and at the individual household level - By Contract Number or Project Number and by Re-certification Month - New Hires Report Detail - By Contract Number or Project Number and by Re-certification Month – No Income report - Existing Tenant Search - Multiple Subsidy Report – Summary and Detail Report <p><u>Disaster Housing Assistance Program (DHAP) Reports</u></p> <ul style="list-style-type: none"> - Disaster Tenant Information (Internal Report) - PHA Disaster Tenant Report (External Report) <p>Regular and ad hoc reports using EIV data will be distributed for use by HUD staff in oversight of the PIH and MF Housing tenant re-certification processes as well as to PHAs and owners and agents in implementing tenant re-certifications. PHAs and Multifamily (MF) Housing owners and agents also will be provided information regarding tenant IDs where identification information, including SSN, did not pass verification through the Social Security Administration. No income information will be obtained or displayed if the ID did not pass verification.</p>
	<p>Other identification number (specify type):</p>
<p>X</p>	<p>Date of Birth (DOB). Only the year of birth is displayed on the following reports:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Head of Household Summary Report and Income Report - By Reexamination Month - Income Report Detail - By Reexamination Month - New Hires Report Detail - New Hires Report – Detail Report - By Reexamination Month – Income Report Summary - By Reexamination Month - New Hire Report Summary - New Hires Report – Summary Report - Multiple Subsidy Report – Summary Report - Multiple Subsidy Report – Detail Report <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - Head of Household Summary Report and Income Report - By Contract Number or Project Number and by Re-certification Month – Summary Report, Income Report Detail - By Contract Number or Project Number and by Re-certification Month - Income Discrepancy Report Detail

	<p>- By Contract Number or Project Number and by Re-certification Month - New Hires Report Summary Report and Detail Report</p> <p>- By Contract Number or Project Number and by Re-certification Month – No Income Report</p> <p>- Multiple Subsidy Report - Summary Report</p> <p>- Multiple Subsidy Report – Detail Report</p> <p><u>DHAP Report</u></p> <ul style="list-style-type: none"> - PHA Disaster Tenant Report - Detail report <p>The full DOB is disclosed on the following reports:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Deceased Tenants Report - Identity Verification Report <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - Deceased Tenants Report - Identity Verification Report <p><u>DHAP Report</u></p> <p>PHA Disaster Tenant Report – Summary report</p>
X	<p>Home address Tenant address as reported in IMS or TRACS is displayed on the following reports:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Household Income Details page and Household Summary page. - By Reexamination Month – Income Report Summary - By Reexamination Month - New Hire Report Summary - By Reexamination Month – Income Discrepancy - Summary Report - By Reexamination Month – Income Discrepancy – Detail Report - New Hires Report – Summary Report - Multiple Subsidy Report – Detail Report <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - By Contract Number or Project Number and by Re-certification Month - Income Report Summary and Detail - By Contract Number or Project Number and by Re-certification Month - New Hire Report Detail - Multiple Subsidy Report – Detail Reports <p><u>DHAP Report</u></p> <p>PHA Disaster Tenant Report – Summary report</p>
	Home telephone
	Personal e-mail address

	Fingerprint/ other “biometric”
	Other (specify):
	None
X	Comment: Identifiers of PIH program participants are extracted from the IMS system and imported into EIV. Identifiers of MF Housing program participants are extracted from TRACS for use by EIV. Access to the household level of the Income Discrepancy Report for PIH is more restricted than access to other (summary levels) of that report. Identities of DHAP program participants are extracted from the Disaster Information System (DIS).

Personal/ Sensitive Information:

	Race/ ethnicity
	Gender/ sex
	Marital status
	Spouse name
	# of children
X	Income/ financial data (specify type of data, such as salary, Federal taxes paid, bank account number, etc.): EIV contains quarterly wage, unemployment compensation benefits, and new hires (federal form W-4) data for household members who are 18 years of age or older and Social Security benefit information for all recipient household members, regardless of age.
X	Employment history: EIV contains wage amount for a given quarter, the date an employee was hired (from federal form W-4), employer name, employer address, employer telephone number (if available) and the employer’s Federal Employer’s Identification Number (FEIN) or equivalent code for Federal agencies as employers.
	Education level
	Medical history/ information
X	Disability - EIV does state if the Social Security Administration has found the person to be disabled, however, EIV does not state the nature of the disability.
	Criminal record
	Other (specify):
	None
	Comment:

Question 2: Will any of the personally identifiable information be accessed remotely or physically removed?

	Yes	No
If yes, Proceed to answering the following questions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Have the security controls been reviewed and approved by the Information Security Officer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

What security controls are in place to protect the information (e.g., encryptions)?

EIV is maintained in a secure datacenter. Users access the HUD network over the web with sessions that are protected by the HTTPS protocol with high-level encryption. For access to the HUD applications, HUD requires users to use its enterprise single sign-on security interface, Web Access Security System (WASS). WASS consists of a secure connection component and a secure systems component. In order to obtain a WASS ID, HUD's trusted Business Partners, which includes the Public Housing Authorities and Multifamily owner/agents, to submit requests for the authority to access secure systems that reside behind HUD's firewall. The data captured by the secure connection registration pages is used to establish authorized users on the Lightweight Directory Access Protocol (LDAP) server. Secure Connection provides system level security by validating users against the LDAP server prior to providing them access to HUD's Secure Systems environment from the Internet. Users are validated by capturing their user identifications (IDs) via the authentication box that is displayed upon connection to the LDAP server. Upon a user's valid entry into HUD's secure systems environment, control is passed from secure connection to secure systems, which enforces application security.

In order to access the EIV application, users must be assigned an EIV role. User access is controlled by roles defined by organizational hierarchy and assigned according to the scope and nature of the user's need for access. In order to be approved for access to EIV, a user must sign an application agreeing to the EIV Rules of Behavior, the application must be signed by his/her supervisor and must be approved by an EIV User Administrator. EIV User Administrators have policy guidance that they must remove users promptly when the user's access no longer is necessary. User access must be re-certified at least semi-annually.

What HUD approved application is used to grant remote access (e.g., VPN, Citrix)?

In order to be approved for access to the internal HUD network via VPN or CITRIX, HUD employees must complete and sign an application form that includes security rules of behavior. The application must be approved by their supervisor and the Information System Security Officer. The access that they obtain to EIV is the same as they would have if they were sitting at their desk. Access to the HUD network will only be successful if the user has a valid active HUD (WASS) ID and password. Access to EIV will only be successful if the user has an active EIV role. EIV roles provide access within an organizational hierarchy to assure that the scope of a user's access to records is consistent with the user's need for information.

Is there a policy in place restricting remote access from certain locations outside the Department (For example: Policy may permit remote access, but prohibits access from a particular place; such as, Kinko's/Starbuck) or is remote access permitted from all areas outside the Department?

There is no policy limiting access by location.

Is there a policy that identifies “if” or “if not” downloading and remote storage of this information is allowed (For example: Policy may permit remote access, but prohibit downloading and local storage)?
Comment: Downloading to local storage is permitted with prior approval. Downloads containing personal information have Privacy Act warnings and the WASS ID of the individual who downloaded the file. There is detailed guidance concerning the protection of data outlined in the Departments Rule of Behavior for remote access. (Also see HUD IT Security Policy Handbook 2400.25 Rev.2, Section 5.2.20).

Question 3: Type of electronic system or information collection.

A. If a new electronic system (or one in development): Is this a new electronic system (implemented after April 2003, the effective date of the E-Government Act of 2002)?

	Yes	No
If yes, please proceed to answering the following questions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the system require authentication?	<input type="checkbox"/>	<input type="checkbox"/>
Is the system browser-based?	<input type="checkbox"/>	<input type="checkbox"/>
Is the system external-facing (with external users that require authentication)?	<input type="checkbox"/>	<input type="checkbox"/>
Comment: The IMS system had a PIA conducted in 2003. EIV conducted its first PIA in November 2004, April 2005, September 2005, March 2006, November 2006, and February 2008. EIV uses IMS household information as input by PHAs into IMS (household member names, dates of birth, SSNs, and unit address). EIV uses the equivalent MF Housing data as input by MF Housing owners and their agents into the TRACS system and extracted for EIV. The most recent TRACS PIA was in April 2009. The DIS system had a PIA in May 2009.		

B. If an existing electronic system: Mark any of the following conditions for your existing system that OMB defines as a “trigger” for requiring a PIA (if not applicable, mark N/A):

X	Conversion: When paper-based records that contain personal information are converted to an electronic system. Comment: EIV relies on data that originally was input on the form HUD-50058 for PIH and the form HUD-50059 for MF Housing.
	From Anonymous (Non-Identifiable) to “Non-Anonymous” (Personally Identifiable): When any systems application transforms an existing database or data collection so that previously anonymous data becomes personally identifiable
X	Significant System Management Changes: When new uses of an existing electronic system significantly change how personal information is managed in the system. (Example #1: when new “relational” databases could combine multiple identifying data elements to more easily identify an individual. Example #2: when a web portal extracts data elements from separate databases, and thereby creates a more open environment for exposure of personal data). Comment: The TASS system was discontinued on September 29, 2006.
	Merging Databases: When government databases are merged, centralized, matched, or otherwise significantly manipulated so that personal information

	becomes more accessible (with special concern for the ability to combine multiple identifying elements)
	New Public Access: When <u>new</u> public access is given to members of the public or to business partners (even if the system is protected by password, digital certificate, or other user-authentication technology)
	Commercial Sources: When agencies systematically incorporate into databases any personal data from commercial or public sources (ad hoc queries of such sources using existing technology does not trigger the need for a PIA)
	New Inter-agency Uses: When agencies work together (such as the federal E-Gov initiatives), the lead agency should prepare the PIA
X	Business Process Re-engineering: When altering a business process results in significant new uses, disclosures, or additions of personal data.
	Alteration in Character of Data: When adding new personal data raises the risks to personal privacy (for example, adding financial information to an existing database that contains name and address)

C. If an Information Collection Request (ICR): Is this a new Request that will collect data that will be in an automated system? Agencies must obtain OMB approval for information collections from 10 or more members of the public. The E-Government Act of 2002 requires a PIA for ICRs only if the collection of information is a new request and the collected data will be in an automated system.

X	Yes, this is a new ICR and the data will be automated
	No, the ICR does not require a PIA because it is not <u>new</u> or <u>automated</u>)
	Comment: PIH Debts Owed to PHAs & Terminations pending OMB approval

Question 4: Why is the personally identifiable information being collected? How will it be used?

Homeownership:

	Credit checks (eligibility for loans)
	Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information
	Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD)
	Loan default tracking
	Issuing mortgage and loan insurance
X	Other (specify): Eligibility and suitability for participation in federally assisted rental housing programs.

Rental Housing Assistance:

X	Verification of family annual income during mandatory re-certifications and monitoring and oversight of Owner/Agent and PHA operations.
	Characteristics on those receiving rental assistance (for example, race/ethnicity, # of children, age)
	Property inspections
	Other (specify):

X	Comment: Personal identifiers are required to facilitate ongoing computer matching efforts and for use by the HUD Office of Inspector General (OIG) in the detection of fraud, waste and abuse in HUD's rental assistance programs.
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Grants:

	Grant application scoring and selection – if any personal information on the grantee is included
	Disbursement of funds to grantees – if any personal information is included
	Other (specify):
	Comment:

Fair Housing:

	Housing discrimination complaints and resulting case files
	Other (specify):
	Comment:

Internal operations:

	Employee payroll or personnel records
	Payment for employee travel expenses
	Payment for services or products (to contractors) – if any personal information on the payee is included
	Computer security files – with personal information in the database, collected in order to grant user IDs
	Other (specify):
	Comment:

Other lines of business (specify uses):

Question 5: Will you share the information with others (e.g., another agency for a programmatic purpose, or outside the government)?

	Federal agencies? (specify):
	State, local, or tribal governments?
X	Public Housing Agencies (PHAs) or HUD-assisted property owners/agents
	FHA-approved lenders?
	Credit bureaus?
	Local and national organizations?
	Non-profits?
	Faith-based organizations?
	Builders/ developers?
	Others? (specify):
	Comment: Public Housing Agencies (and/or their agents) that administer Section 8

	Housing Choice Voucher and Public Housing programs and Multifamily owners, their agents and the employees of the agents that administer a HUD rental housing assistance program will have access to the information, which is to be used in determining tenant income as part of setting rental housing subsidy. Information also is shared with HUD OIG for audits and investigations regarding rental housing programs and the Department of Justice as necessary. All of the above parties may use independent auditors under contract, in which case the auditors may have access.
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Question 6: Can individuals “opt-out” by declining to provide personal information or by consenting only to particular use (e.g., allowing their financial information to be used for basic rent eligibility determination, but for not for sharing with other government agencies)?

	Yes, they can “opt-out” by declining to provide private information or by consenting only to particular use
X	No, they can’t “opt-out” – all personal information is required
	Comment:

If Yes, please explain the issues and circumstances of being able to opt-out (either for specific data elements or specific uses of the data): _____

Question 7: How will the privacy of the information be protected/ secured? What are the administrative and technological controls?

X	System users must log-in with a password
	<p>When an employee leaves:</p> <ul style="list-style-type: none"> • How soon is the user ID terminated (1 day, 1 week, 1 month, unknown)? PHAs and MF Housing owners and agents are encouraged to terminate the user ID immediately. In addition, PHAs are asked to certify as to the continuing need and scope of user system access each quarter. In order to reduce the burden, this will be changed to twice per year. Owners and agents and contract administrators certify their employees twice per year. Owners and agents and contract administrators also are certified twice per year when acting as Users but annually when acting as EIV Coordinators. In each case, if there is no certification within 30 days, the user’s access is automatically terminated by the system. • How do you know that the former employee no longer has access to your system? (Explain your procedures or describe your plan to improve): For PIH, the user’s WASS ID is not found in the EIV User Administration module. For MFH and DHAP, the WASS ID will not have EIV roles.
	<p>Are access rights selectively granted, depending on duties and need-to-know? If Yes, specify the approximate # of authorized users who have either:</p> <ul style="list-style-type: none"> • Full access rights to all data in the system (specify #)? For PIH: 93 HUD Headquarters users, of which 88 users are Special Agents of HUD’s Office of Inspector General (OIG). For MF: 171 users (89 Special Agents from HUD’s Office of the Inspector General, 48 HUD Headquarters MF Housing staff).

- Limited/restricted access rights to only selected data (specify #)? Strict procedures are in place to assign user IDs and selective access rights. Both PIH and MF Housing users must sign a form acknowledging legal penalties for improper release of privacy data contained in the EIV system and agreeing to follow the EIV rules of behavior. PHA executive directors also must approve PHA users in writing or electronically. The HUD Field Office reviews and approves PIH requests for access. A MF Housing owner provides a letter of approval for a person to be an EIV Coordinator having access to EIV data on his/her behalf. Access is then provided to the EIV Coordinator by the MF Helpdesk and the EIV Coordinator provides access to the users that work for him/her. A person requesting access as an EIV Coordinator for a CA must have approval from an authorized official of the CA firm. Access is then approved and provided to the EIV Coordinator by the MF Helpdesk and the EIV Coordinator provides access to the users that work for him/her
 - HUD users: 429 PIH field office staff and 181 MF Housing Field Office staff. For DHAP, an estimated 75 Headquarters users.
 - Business partner users: 17,205 PIH users serve as Occupancy users with access to tenant income data. Of these, 1,636 are Application Processors, 9,754 have access to data of Public Housing (Low Rent Program) tenants within their jurisdiction and 11,200 have access to data of Section 8 Housing Choice Voucher tenants within their jurisdiction. These groups have substantial overlap due to the high percentage of PHAs having both programs. 22,187 Multifamily users have access to tenant income data. Of these, 263 are contract administrators, 498 are users working for the contract administrators, 6,638 property owners with HUD contracts and 14,788 users working for the owners and agents.) With the implementation of the regulation making use of EIV mandatory for PHAs and owner/agents (effective January 31, 2010) the number of PHA users is expected to increase by 10% and the number of MF Housing business partner users is expected to increase by 25%. An estimated 3000 PHA users will have access to DHAP household income data for households assigned to their PHA.

NOTE: A user can only see data of tenants within their specified jurisdiction. For example, staff at the Housing Authority of Baltimore City can only see data for tenants residing in units managed by their agency. Staff would not be able to see data for The Housing Commission of Anne Arundel County. Also, access rights are limited by program type; thus a staff person who only works with Public Housing tenants cannot see data for Section 8 Housing Choice Voucher tenants and vice versa and neither would see data for MF Housing tenants. HUD staff can see data for tenants within all programs. The same principle applies to Multifamily Housing and DHAP program users.

X	<p>Are disks, tapes, and printouts that contain personal information locked in cabinets when not in use? (explain your procedures, or describe your plan to improve): The personal information can be printed out by a user, which is maintained in locked cabinets and/or files.</p> <p>Printouts (and screen prints) of the following reports only contain the last four digits of the date of birth and SSN:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Head of Household Summary Report and Income Report - By Reexamination Month - Summary Report and Income Report Detail Report - By Reexamination Month - New Hires Report Summary Report and Report Detail - Existing Tenant Search- By Reexamination Month –Failed Verification Report - By Reexamination Month –No Income Report <p>Multiple Subsidy Report -- Summary Report and Detail Report</p> <ul style="list-style-type: none"> - New Hires Report – Summary Report and Detail Report - Existing Tenant Search <p>Tenant Data Access Report printer-friendly version (the on-screen version and therefore its screen print has the full SSN)</p> <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - Head of Household Summary Report and Income Report - By Contract Number or Project Number and by Re-certification Month – Summary Report and Income Report Detail - By Contract Number or Project Number and by Re-certification Month – New Hires Report Detail – Income Discrepancy Report at the individual household, By Re-certification Month Summary and Detail Report levels. - Multiple Subsidy Report – Summary and Detail Report - Existing Tenant Search <p><u>DHAP Reports</u></p> <ul style="list-style-type: none"> - Disaster Tenant Information (for Internal users) - PHA Disaster Tenant Report <p>Printouts (and screen prints) of the following reports contain the full SSN:</p> <p><u>PIH Reports</u></p> <ul style="list-style-type: none"> - Income Discrepancy Report in the individual household level, - Identity Verification Report - Deceased Tenants Report - Tenant Data Access Report <p><u>MF Reports</u></p> <ul style="list-style-type: none"> - Deceased Tenants Report at the Contract, and Project levels - Identity Verification Report at the Contract, and Project levels <p>Access to tenant information is defined by role assignment granted on the basis of work requirements for that access. Some roles receive no access to tenant data.</p>
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Some public housing roles receive only summary discrepancy data at an entity level. Those who have access to EIV tenant data have received instructions (backed up by on-site audits) requiring that printouts, disks containing downloads and work products containing individual information be locked up when not in use.

HUD makes the following information available for download by HUD business partner users (PHAs for PIH programs and owners and their agents and contract administrators for Multifamily Housing programs): The individual identifier information is that which came from the HUD business partners.

HUD's business partners for PIH are the PHAs and for MF Housing, these are the property owners and their agents (which include some PHAs). As a service to HUD's business partners, HUD has created the EIV downloadable reports described below. These reports contain tenant Privacy Act data, but it should be kept in mind that the identifiers are those known to the HUD business partners because they are the source of that data.

Public Housing Program downloadable reports:

Failed Verification Report: This report lists the Heads of Household or other family members for whom ID verification failed at the Social Security Administration and the reason for the failed ID verification. The report is to assist the PHA in correcting the information that they have submitted. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Project Number (only for Public Housing program participants), Member SSN (Masked), Member Name, Member Date of Birth, and description of reason for failed ID verification.

Income Summary Report: This report lists households receiving income or benefits from NDNH and SSA. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Project and Unit Address. Income information is not downloaded.

No Income Report: This report lists households with no income. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Project Number (only for Public Housing program participants) and Unit Address.

Income Discrepancy Summary Report: This report lists households with income discrepancies. The fields are: Head of Household SSN, Head of Household Name, Project, Annual Income Discrepancy, Annual Income Discrepancy using annualized last quarter data, and the Threshold percentage which is the computed percentage difference when the projected income reported form 50058 is compared against the income data collected by EIV. This report is formerly known as the Exceeds Threshold Report.

New Hires Report: This report lists household members over 18 for whom a new employer has filed a Federal form W-4 within the last 180 days from the report date. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Member SSN, Member Name, Program Type, Project Number (only for Public Housing program participants) and Unit Address.

Multiple Subsidy Report: This report lists tenants where HUD records show the tenant receiving multiple subsidies during a report period. This may be inclusion in more than one household, subsidies in both public housing and voucher programs or subsidies in both PIH and MF Housing programs. The fields are: Member SSN (Masked), Member Last Name, Member Date of Birth, PHA Code, Project Number (only for Public Housing program participants), 50058 Effective Date, Type of Action, Head of Household SSN (Masked), Head of Household Name, Program Type/Subsidy Type, Relationship of the Member, Head of Household PHA Code, Development Code (only if the household is in Public Housing program), Head of Household Contract Number (only if the household a Multifamily Housing program participant), Head of Household Project Number (only if the household is a Multifamily Housing program participant), and Unit Address.

Deceased Tenants Report: This report lists the household/ household member information for households with one or more deceased household members. The fields are: Head of Household SSN, Head of Household Name, Head of Household Date of Birth, Project Number (only for Public Housing program selection), Member SSN, Member Name, Member Date of Birth, and Member Deceased Date.

PHA (Name of User Role Selected) User Certification Report: This report lists User ID, First Name, Last Name, PHA Code, Active Status and Role. For status, Certified means that the user's roles were certified during the last quarter. Pending means that a PHA request for role assignment is pending approval by the HUD Field Office, Expired means that the individual was not certified during the most recent period, and Approved means that a PHA request for role assignment was approved but that the ID has not gone through the certification process yet. IDs that were dropped due to failure to certify are not listed. This report is named by the EIV role for which the user wants to download the information. The fields are: Program Type, Total Number of Users, User Name, User ID, Expiration Date, Last Certification Date, Status and Roles assigned to the user.

Existing Tenant Search: This report provides the capability to search by SSN and show whether an individual (applicant or tenant) is receiving housing subsidies in any PIH or Multifamily Housing Program.

Deceased Tenant Report: This report provides the capability to search by a project number or contract number for a particular recertification month; shows the basic information of the households/ household members for households with deceased household members.

Multifamily Housing downloadable reports:

Income Report (household level). This report provides information on households due for re-certification and receiving income or benefits from NDNH and SSA. Reports are generated for all family members with validated personal identifiers in households due for re-certification in the indicated month. This report is available by contract number and/ or by project number. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth (displays only the year), Contract Number, Project Number and Unit Address, Family Member SSN (Masked), Relationship, Lump Sum Payment Amount, Monthly Social Security Benefits, Medicare Premium, Disability Indicator (Y/N), Disability Onset Date, SSI Assistance Amount, and Dual Entitlement Amount. Income information is not downloaded.

New Hires Report: This report lists household members over 18 for whom a new employer has filed a Federal form W-4 within the last 180 days from the report date. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth (displays only the year), Member Name, Contract Number Type, Project Number and Unit Address.

Multiple Subsidy Report: This report provides a list of tenants where HUD records show the tenant receiving multiple subsidies during a report period. This may be inclusion in more than one household of different contract numbers, or subsidies in both PIH and MF Housing programs. The fields are: Member SSN (Masked), Member Last Name, Member Date of Birth (displays only the year), Contract Number, Project Number, Effective Date, Certification Type, Head of Household SSN (Masked), Head of Household Name, Program Type/Subsidy Type, Relationship of the Member, Head of Household Contract Number, Head of Household Project Number, Head of Household PHA Code (only if the household is in PIH program), Development Code (only if the household is in Public Housing program) and Unit Address.

Existing Tenant Search: This report provides the capability to search by SSN and show whether an individual (applicant or tenant) is receiving housing subsidies in any PIH or Multifamily Housing Program.

Deceased Tenant Report: This report provides the capability to search by a project number or contract number for a particular recertification month; shows the basic information of the households/ household members for households with deceased household members.

No Income Report: This report lists households with no income, the fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Project Number/Contract number and Unit Address

Income Discrepancy Report: This report lists households with income discrepancies. The fields are: Head of Household SSN, Head of Household Name, Project, Annual

	<p>Income Discrepancy, Annual Income Discrepancy using annualized last quarter data, and the Threshold percentage which is the computed percentage difference when the projected income reported form 50059 is compared against the income data collected by EIV.</p> <p>Income Summary Report: This report lists households receiving income or benefits from NDNH and SSA. The fields are: Head of Household SSN (Masked), Head of Household Name, Head of Household Date of Birth, Project and Unit Address. Income information is not downloaded.</p> <p>Failed EIV Pre-Screening Report: This report provides a list of tenants for the selected contract(s) and/or property(ies) that were not sent to SSA for verification because they failed the EIV pre-screening test. The screen displays the same information that is displayed on the Failed Verification Report for Contract [Project]</p> <p>Failed Verification Report: This report provides the list of MF tenants for whom SSA was unable to provide income or benefit information and the reason the ID information (SSN, last name and date of birth) failed verification.</p> <p>DHAP Reports <u>Downloadable reports</u>:</p> <p>Access to tenant information is defined by role assignment granted on the basis of work requirements for that access.</p> <p>PHA Disaster Tenant Report: This report provides the list of DHAP household receiving income or benefits for NDNH and SSA which got transferred from FEMA to DHAP system.</p>
X	<p>If data from your system is shared with another system or data warehouse, who is responsible for protecting the privacy of data that came from your system but now resides in another? Explain the existing privacy protections, or your plans to improve:</p> <p>Data is extracted to a data warehouse to be used solely by PIH and MF Housing for management reports and for refinements and special runs of variants of existing EIV reports. The primary difference will be the ability to use reports with data from multiple periods. Access to the data warehouse is strictly controlled by the EIV Headquarters User Administrators for PIH and MF Housing. All reports containing personal data will be marked on the top sheet “Warning: this report contains personal data. The only permitted uses are to assist in the re-certification process by Public Housing or in the oversight of that process.” Following sheets will be marked at the top and bottom: <i>“Confidential Privacy Act Data. Civil and criminal penalties apply to misuse of this data.”</i></p>
X	<p>Other methods of protecting privacy (specify):</p> <ul style="list-style-type: none"> • Unauthorized access is reduced by restricted access by job functions and the use of user IDs/ passwords. • Record access at the record-level is identified and tracked by user ID and date of access.

	<ul style="list-style-type: none"> • EIV has built-in logs that track access to sensitive data. EIV Security Administrators are to review these logs on a regular basis. Any intrusions (unauthorized access attempts) are to be reported to management and to the Office of Inspector General (OIG) as appropriate. • Actions in the EIV user administration module for PIH and in WASS for MF Housing are logged so that a user's level of access at a given date and time can be ascertained should there later be an issue. • Servers are maintained in a secure datacenter and access is protected by firewalls. User sessions over the web are protected by the HTTPS protocol with high-level encryption. File transfers for data processing are done using high-level encryption.
X	Comment: See http://www.hud.gov/offices/pih/programs/ph/rhiip/docs/eivsecguidepha.pdf

Question 8: If privacy information is involved, by what data elements can it be retrieved?

Mark any that apply:

X	Name: Last Name
X	Social Security Number (SSN)
	Identification number (specify type):
X	Birth date
	Race/ ethnicity
	Marital status
	Spouse name
	Home address
	Home telephone
	Personal e-mail address
	Other (specify):
	None
X	Comment: In addition to search by the Head of Household's full SSN, or last name, or date of birth, EIV PHA Occupancy users can search and access tenant and income information by program type and re-examination month. In addition to search by the Head of Household's full SSN, or last name, or date of birth, and re-examination month, EIV MF Housing users may search by contract number and by project number.

Other Comments (or details on any Question above):

SECTION 3: DETERMINATION BY HUD PRIVACY OFFICER

HUD's Information Management System (IMS), formerly known as the Public and Indian Housing Information Center (PIC), had a PIA conducted in August 2008. The EIV system is dependent upon IMS for data extraction of personal and sensitive data to be imported into EIV. EIV imports MF Housing data from the TRACS system in order to maintain current information

as to the program status of MF Housing tenants. The most recent TRACS PIA was in April 2009. These are posted on <http://www.hud.gov/offices/cio/privacy/pia/pia1.cfm#rental>

The personal and sensitive data listed in Question 1 above is collected for the 2.5+ million households receiving rental assistance each year under the programs administered by the Office of Public and Indian Housing (PIH) and more than 1.3 million households receiving rental assistance each year under the programs administered by the Office of Housing. However, as detailed in Question 6, there are strict controls in place in order to get an ID approved for access to EIV. Users must sign an application form that includes the EIV Rules of Behavior. PHA users must have their application approved by the PHA's executive director and then by the HUD Field Office. MF Housing users must have their application signed by the Coordinator for whom they work. MF Housing Coordinators must have a letter on file from the owner approving their access (subject to confirmation during on-site review). HUD users must have their application approved by their supervisor. Also, the scope of access is determined by the kind of role assigned to a user and that user's organization. Thus, IDs issued to the PHA staff are restricted to allow data access only on those tenants within a PHA's jurisdiction. MF Housing users' access is according to the contracts or properties of the owner or agent that the owner or agent has approved them to work on. HUD user access is determined by their organization. Field Office users access data within the jurisdiction of the Field Office. Hub users access data within the jurisdiction of the Hub.

Although EIV is a recent system, it has implemented a comprehensive Security Plan and strict access controls are in place, as summarized in Question 6 above. In April 2005, EIV received an authority to operate (ATO) following an independent security review that included penetration testing and which measured EIV compliance with National Institute of Standards and Technology (NIST) security standards. In March 2006, an ATO was issued based on review of system documentation. In September 2006, an ATO was issued following a second independent security review for compliance with NIST security standards. On/September 15, 2009, an ATO was issued following a third independent security review for compliance with NIST security standards.

Because of the vast amount of personal and sensitive information, we will annually monitor this system and related business processes to ensure that adequate privacy protections continue to be in place.