

# U. S. Department of Housing and Urban Development

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## Public and Indian Housing Information Technology Information Security Program

Financial Assessment  
Sub-System – Public Housing

Privacy Impact Assessment

October 21, 2005

**DOCUMENT ENDORSEMENT**

I have carefully assessed the Privacy Impact Assessment (PIA) for the Financial Assessment Sub-System – Public Housing (FASS-PH). This document has been completed in accordance with the requirements set forth by the Federal Information Security Management Act of 2002 (FISMA), Office of Management and Budget (OMB), National Institute of Standards and Technology (NIST), and Public and Indian Housing (PIH) Information Technology (IT) Office.

**MANAGEMENT ENDORSEMENT**

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.

**/s/ Eric M. Stout**

**Departmental Privacy Advocate**

Office of the Chief Information Officer  
U. S. Department of Housing and Urban Development

**Dec. 14, 2005**

**Date**

**/s/ Jeanette Smith**

**Departmental Privacy Act Officer**

Office of the Chief Information Officer  
U. S. Department of Housing and Urban Development

**Dec. 14, 2005**

**Date**

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**APPROVED/ FINAL**

**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)  
PRIVACY IMPACT ASSESSMENT (PIA) FOR:**

**Financial Assessment Sub-System – Public Housing (FASS-PH)  
(For Information Collections: OMB Control #: TBD)  
(For IT Systems: OMB Unique Identifier: TBD)  
PCAS # REAC - 307820  
October 2005**

**SECTION 1. BACKGROUND**

**Importance of Privacy Protection – Legislative Mandates**

The Department of Housing and Urban Development (HUD) is responsible for ensuring the privacy and confidentiality of the information it collects on members of the public, the beneficiaries of HUD programs and business partners, and its own employees. These individuals have a right to expect that HUD will collect, maintain, use, and disseminate personally identifiable information (PII) 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](#), 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](#));
- Computer Matching and Privacy Protection Act of 1988, which amends the Privacy Act of 1974, 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 public information maintained by Federal agencies, 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](#) requires Federal agencies to conduct PIAs on their electronic systems (See [http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107\\_cong\\_public\\_laws&docid=f:publ347.107.pdf](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](http://www.whitehouse.gov/omb/egov/pres_state2.htm));
- [Federal Information Security Management Act of 2002](#), which supersedes 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>)]; and
- Office of Management and Budget ([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 PII will be restricted to those staff who need the data to carry out their duties. Such staff will be held accountable for ensuring privacy and confidentiality of the data.

### **What is the PIA Process?**

The PIA process evaluates issues related to the privacy of PII in electronic systems. (See background on PIAs and the seven questions that need to be answered at: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.) PII is defined as information that identifies an individual by name, address, social security number (SSN), or identifying number or code; or by other personal/ sensitive information such as race, marital status, financial information, home telephone number, or personal e-mail address. Of particular concern is the combination of multiple identifying elements. For example, knowing the name, SSN, birth date, and financial information would pose greater risk to privacy than knowing only the name and SSN.

The PIA:

- Identifies the type of PII in the system and the system's ability to combine multiple identifying elements on an individual,
- Identifies who has access to that information and whether they have full access or limited access rights, and
- Defines the administrative controls which ensure that only the information necessary and relevant to HUD's mission is in the system.

### **Who Completes the PIA?**

The program area system owner and the information technology (IT) project leader work together to complete the PIA. The system owner describes what personal data types are collected, how the data are 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 to PII.

### **When is a PIA Required?**

- 1. New Systems.** According to OMB requirements, a PIA is required for any new system, including major and non-major systems, containing personal information on members of the public.
- 2. Existing Systems.** A PIA is required where significant modifications have been made to an existing system that involve personal information on members of the public or may create a new privacy risk.
- 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, a PIA is required.

### **What are the Privacy Act Requirements?**

The [Privacy Act of 1974](#), 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, by some other identifying number or symbol, or by other particular identifiers assigned to an individual. The [E-Government Act of 2002](#) requires PIAs for electronic systems and for information collection requests that are automated. Therefore, a relationship exists between the new PIA requirement (when automation is involved) and the long-standing Privacy Act System of Records Notice requirement (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 (OCIO).

### **Why is the PIA Summary Made Publicly Available?**

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 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 (PIH) – Information Technology (IT)  
**Subject Matter Expert in the Program Area:** Nicholas Miele, Assessment Manager, Departmental Real Estate Assessment Center, Office of Public and Indian Housing, (202) 475-8788

**Program Area Manager:** Nicholas Miele (See above)

**IT Project Leader:** Freddie Harrison, Departmental Real Estate Assessment Center, Office of Public and Indian Housing, (202) 475-8639

For IT Systems:

- **Name of system:** Financial Assessment Subsystem – Public Housing (FASS-PH)
- **PCAS #:** REAC – 307820
- **OMB Unique Project Identifier #:** TBD

For Information Collection Requests:

- **Name of Information Collection Request:** TBD
- **OMB Control #:** TBD

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

The Financial Assessment Subsystem – Public Housing (FASS-PH) is a subsystem of the Real Estate Assessment Center (REAC) system. FASS-PH enables HUD to centralize financial analysis in order to optimize allocation of limited resources to improve service delivery and manage housing programs proactively. FASS-PH supports HUD’s E-Government Strategic Plan by automating paper-based forms as mandated by the Government Paperwork Elimination Act (GPEA).

HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals. FASS-PH gathers standard financial data pertaining to each Public Housing Agency (PHA) and Section 8 Entity by combining standard fiscal audit information with reporting and compliance factors as defined in the Single Audit Act.

If this automated system (or Information Collection Request) involves PII on members of the public, then mark any of the categories that apply below:

**Personal Identifiers:**

	Name:
	Social Security Number (SSN):
	Other identification number (specify type):
	Birth date:
	Home address:
	Home telephone:
	Personal e-mail address:
	Fingerprint/ other “biometric”:
	Other (specify):
X	None
X	Comment: HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals. FASS-PH gathers standard financial data pertaining to each PHA and Section 8 Entity by combining standard fiscal audit information with reporting and compliance factors as defined in the Single Audit Act.

**Personal/ Sensitive Information:**

	Race/ethnicity:
	Gender:
	Marital status:
	Spouse name:
	Number of children:
	Income/financial data (specify type of data, such as salary, Federal taxes paid, bank account number):
	Employment history:
	Education level:
	Medical history/information:
	Disability:
	Criminal record:
	Other (specify):
X	None
X	Comment: HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals. FASS-PH gathers standard financial data pertaining to each PHA and Section 8 Entity by combining standard fiscal audit information with reporting and compliance factors as defined in the Single Audit Act.

**Question 2: Type of electronic system or information collection.**

Fill out Section A, B, or C as applicable.

**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
X	No
X	Comment: FASS-PH is an existing system in the operational phase of its system development life cycle. PIH IT is conducting this initial PIA on the system in recognition of the importance of privacy protection and as part of its Department privacy best practices.

**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):

N/A	<b>Conversion:</b> When paper-based records that contain personal information are converted to an electronic system
N/A	<b>From Anonymous (Non-Identifiable) to “Non-Anonymous” (Personally Identifiable):</b> When any systems application transforms an existing database or data collection so that previously anonymous data become personally identifiable
N/A	<b>Significant System Management Changes:</b> When new uses of an existing electronic system significantly change how personal information is managed in the system. ( <i>Example 1:</i> when new “relational” databases could combine multiple identifying data elements to more easily identify an individual. <i>Example 2:</i> when a web portal extracts data elements from separate databases and thereby creates a more open environment for exposure of personal data)
N/A	<b>Merging Databases:</b> 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)
N/A	<b>New Public Access:</b> 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)
N/A	<b>Commercial Sources:</b> 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)
N/A	<b>New Inter-agency Uses:</b> When agencies work together (such as the Federal E-Gov initiatives), the lead agency should prepare the PIA
N/A	<b>Business Process Re-engineering:</b> When altering a business process results in significant new uses, disclosures, or additions of personal data
N/A	<b>Alteration in Character of Data:</b> When adding new personal data raises the risks to personal privacy (for example, adding financial information to an existing database that contains only a name and address)

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

	Yes. This is a new ICR and the data will be automated.
X	No. The ICR does not require a PIA because it is not <u>new</u> or <u>automated</u> .
	Comment:

**Question 3: Why is the PII being collected? How will it be used?**

Mark any that apply:

**Homeownership:**

<input type="checkbox"/>	Credit checks (eligibility for loans)
<input type="checkbox"/>	Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information
<input type="checkbox"/>	Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD)
<input type="checkbox"/>	Loan default tracking
<input type="checkbox"/>	Issuing mortgage and loan insurance
<input type="checkbox"/>	Other (specify):
<input checked="" type="checkbox"/>	None

**Rental Housing Assistance:**

<input type="checkbox"/>	Eligibility for rental assistance or other HUD program benefits
<input type="checkbox"/>	Characteristics on those receiving rental assistance (for example, race/ethnicity, number of children, age)
<input type="checkbox"/>	Property inspections
<input type="checkbox"/>	Other (specify):
<input checked="" type="checkbox"/>	None

**Grants:**

<input type="checkbox"/>	Grant application scoring and selection – if any personal information on the grantee is included
<input type="checkbox"/>	Disburse funds to grantees – if any personal information is included
<input type="checkbox"/>	Other (specify):
<input checked="" type="checkbox"/>	None

**Fair Housing:**

<input type="checkbox"/>	Housing discrimination complaints and resulting case files
<input type="checkbox"/>	Other (specify):
<input checked="" type="checkbox"/>	None

**Internal Operations:**

<input type="checkbox"/>	Employee payroll or personnel records
<input type="checkbox"/>	Payment for employee travel expenses
<input type="checkbox"/>	Payment for services or products (to contractors) – if any personal information on the payee is included
<input type="checkbox"/>	Computer security files – with personal information in the database, collected in order to grant user IDs
<input checked="" type="checkbox"/>	Other (specify): FASS-PH gathers standard financial data pertaining to each PHA and Section 8 Entity.
<input type="checkbox"/>	None

**Other Lines of Business (specify uses):**

<input checked="" type="checkbox"/>	None
<input type="checkbox"/>	
<input type="checkbox"/>	

**Question 4: Will you share the PII with others?**

For example, another agency for a programmatic purpose or outside the government. Mark any that apply.

	Federal agencies (specify):
	State, local, or tribal governments
	Public Housing Agencies or Section 8 property owners/agents
	FHA-approved lenders
	Credit bureaus
	Local and national organizations
	Non-profits
	Faith-based organizations
	Builders/developers
	Others (specify):
X	None
X	Comment: HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals and does not share such information with others using FASS-PH.

**Question 5: 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.
	No. They can’t “opt-out” – all personal information is required.
X	Comment: HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals. Therefore, no opt-in or opt-out options are necessary or provided.

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): \_\_\_\_\_ N/A \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Question 6: How will the privacy of the information be protected/secured? What are the administrative and technical controls?**

Mark any that apply and give details if requested (if not applicable, mark N/A).

N/A	System users must log in with a password
N/A	When an employee leaves: How soon is the user ID terminated (1 day, 1 week, 1 month, unknown)? How do you know that the former employee no longer has access to your system? (explain your procedures or describe your plan to improve):
N/A	Are access rights selectively granted, depending on duties and need-to-know? If yes, specify the approximate number of authorized users who have either: Full access rights to all data in the system (specify number) Limited/restricted access rights to only selected data (specify number)
N/A	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):
N/A	If data from your system are 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:
X	Comment: HUD does not use FASS-PH to collect, maintain, or disseminate PII from or about individuals.

**Question 7: If privacy information is involved, by what data elements can be retrieved?**

Mark any that apply.

	Name:
	Social Security Number (SSN):
	Identification number (specify type):
	Birth date:
	Race/ethnicity:
	Marital status:
	Spouse name:
	Home address:
	Home telephone:
	Personal e-mail address:
X	None
X	Comment: HUD does not use this system to collect, maintain, or disseminate PII from or about individuals. FASS-PH does not constitute a Privacy Act System of Records and does not contain privacy information that can be retrieved by data element.

**Other Comments (or details on any Question above):**

**SECTION 3. DETERMINATION BY HUD PRIVACY ADVOCATE**

FASS-PH is a Real Estate Assessment Center Subsystem. FASS-PH provides financial statements of Section 8 managing agents and centralizes financial analysis to identify where HUD should focus its limited resources to manage its housing programs proactively. The system is not a concern of privacy because it does not collect, maintain, or disseminate personal/sensitive information.