

**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 either **JCAM ID 957, P207 Mainframe (IBM); JCAM 959, P209 LAN File Server; JCAM 962, P212 Mainframe; or JCAM 1098, X01 Windows Azure Public Cloud** whereas the PIA for PII storage in SharePoint will use the **JCAM 1095, D110 MS O365 MT**. 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. **HUD INFORMATION SYSTEM:**
2. **HUD DIVISION NAME:**
3. **JCAM ID:**

Section 1: Description Summary (For Public Release)

a. The PII collected is on/from: (Check all that apply)

- General public (including Federal Contractors)
- Federal employees
- Third-Party vendors

No PII (Fill out 1c & 11, then go to Section 4)
Other (if selected, enter information 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

d. Why is the PII collected and / or what is the intended use of the PII? (Check all that apply)

- | | | |
|----------------|---------------------|--------------------------------|
| Verification | Data Matching | Business Analytics and Metrics |
| Identification | Mission-Related Use | |
| Authentication | 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, is a Privacy Act Statement, Privacy Notice and/or a Privacy Advisory provided? *(Please provide the "actual wording" in the box below and check as appropriate)*

Privacy Act Statement Privacy Notice Privacy Advisory Not Applicable

h. Source(s) of the PII collected is / are: *(Check all that apply and list all information systems this system receives PII from)*

Individuals

Databases

Existing HUD information systems

Public Source (from internet, news feeds, court records)

Other Federal information systems

Other (if selected, enter information below)

i. How will the PII information be collected? *(Check all applicable choices and list any Official Form numbers and titles)*

Encrypted Email

Telephone interview

Face-to-face contact

Website/e-form

Fax

Paper

Information sharing/system-to system

Other (if selected, enter information below)

Official form

j. With whom will the PII be shared through **electronic data interchange, both within your HUD Division and outside your HUD Division?** *(Check all that apply and list all Office/Division/Agency names)*

Within the HUD Office/Division

Other HUD Office(s)/Division(s)

Other federal agencies

State & local agencies

Contractors (Add contractor name & use the "other" box to describe how the contract describes safeguarding PII)

Other (if selected, enter information)

None

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 and how information is retrieved in the system.

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

b. If the SSN is collected, please list the proper HUD authority to do so. (Reference the Privacy Handbook on Social Security Number Policy)

c. PII Confidentiality Impact Level (PCIL) - **Low **Moderate** **High****
Select the appropriate PCIL

""
 , "C'REKN"Vgo r rrv'ku'pqv'tgs wkt gf "q'dg'uwdo kwgf 'y kj "PIAs being submitted for cp"cppwcn'legt wlc v'kqp. """"
 ""
 ""

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	Closed Circuit TV
Combination locks	Identification badges
Key cards	Safes
Security Guards	Other (if selected, enter information below)

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

Backups Off-Site	Periodic Security Audit
Encryption of Backups	Regular Monitoring of Users' Security Practices
Methods to Ensure Only Authorized Personnel Access to PII	Other (if selected, enter information below)

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

Biometrics	Public Key Infrastructure Certificates
Encryption of Data at Rest	External Certificate Authority Certificates
Firewall	Least Privilege Access
Role-Based Access Controls	User Identification and Password
Virtual Private Network (VPN)	PIV Card
Encryption of Data in Transit	Intrusion Detection System (IDS)
Used Only for Privileged (Elevated Roles)	Other (if selected, enter information 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)*

<input type="checkbox"/> On a centralized HUD server	<input type="checkbox"/> On hard copy documents
<input type="checkbox"/> On individual HUD laptops	Other (if selected, enter information below)
<input type="checkbox"/> In e-mails	

Please specify selection(s) made.

d. Indicate the assessment and authorization status:

Authorization to Operate (ATO)	Date Granted:
ATO with Conditions	Date Granted:
Denial of Authorization to Operate (DATO) Interim	Date Granted:
Authorization to Test (ATT)	Date Granted:
To Be Determined (TBD)	

Section 4: Review and Approval Signatures

Completion of the PIA requires coordination by the System Manager, Information System Security Officer, Privacy Liaison Officer, Records Management Liaison Officer, Paperwork Reduction Act 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 SharePoint 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 the SharePoint Administrator for signature.*

System Owner:

Name:

Signature: _____

SharePoint Admin* or Shared Drive Admin**: (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: _____

Section 4: Review and Approval Signatures Continued

Paperwork Reduction Act Liaison Officer:

Name: _____

Signature: _____

Once all required signatures are collected, please email PIA and PCIL (if applicable) to pia@hud.gov.

HUD Privacy Office will route the PIA to Chief Privacy Officer 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: _____

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

New PIA for a new system and/or a new ATO

Revision of an existing PIA

Annual certification of an existing PIA with changes

Annual certification of an existing PIA with significant changes "

Notification of Rescindment of an existing PIA