

HUD SORN, PIA, and CSAM Crosswalk

The U.S. Department of Housing and Urban Development (HUD) System of Records Notices (SORNs), Privacy Impact Assessment (PIA), and Cyber Security Assessment and Management (CSAM) Crosswalk is designed to help HUD Program Offices understand the similar relationship between HUD SORN form requirements, PIA requirements, and CSAM tool sections for each operational system and to understand the importance of consistency across privacy documentations. Privacy Office best practice is to complete and review the SORN form first by utilizing the SORN Reference Guide. The below information is also mentioned in the HUD PIA Reference Guide and HUD SORN Reference Guide published in the HUD Privacy Website. Please note that the answers may not be the same word for word copy-paste as some questions may ask for more information.

SORN (Bolded are specific questions in the SORN form)	PIA	CSAM
<p>Categories of individuals covered by the system section.</p> <p>Please see the SORN Reference Guide</p>	<p>Information should be consistent with: Question 1a. The PII is:</p> <p>Answer options: From members of the General Public; From a third-party source; From Federal employees and / or Federal contractors; Not Collected; From vendors; Other.</p>	<p>Ensure CSAM reflects that PII is collected: (Yes or No) as appropriate.</p> <p>Location - Top Right of CSAM screen for each system</p>
<p>Purpose(s) of the system</p>	<p>Information should be consistent with: Question 1c. Describe the purpose of this HUD information system or project, including the types of personal information collected within the system.</p>	<p>Mission/Purpose(s) should be consistent with the purpose section in the SORN and PIA.</p> <p>Location - Bottom of the main screen for each system</p>
<p>The PAS comes directly from aspects of the SORN.</p> <ul style="list-style-type: none"> • Purpose(s) of the system • Authority for maintenance of the system • Routine Uses of Records Maintained in the System, Including Categories of Users and Purposes of Such Uses • Disclosure of the information is responsibility of the Program Office to determine/acknowledge if the information collected is mandatory or voluntary. • SORN ID 	<p>Question 1g. When an individual is asked to provide PII, a Privacy Act Statement (PAS) and / or a Privacy Advisory must be provided. (Privacy Act Statement, Privacy Advisory or Not Applicable)</p>	<p>N/A</p>
<p>Routine Uses of Records Maintained in the System, Including Categories of Users and Purposes of Such Uses:</p> <p>Please see the SORN Reference Guide</p>	<p>Question 1h. With whom the data will be shared through data exchange, both within and outside your HUD Division?</p>	<p>N/A</p>

<p>Record source categories:</p>	<p>Question 1i. Source(s) of the PII collected is/are:</p>	<p>Relationships/Interconnections</p> <ul style="list-style-type: none"> • Existing HUD information systems • Other Federal information systems • Databases <p>List/verify the systems where the PII is collected incoming and ensure to include system information fully.</p>
<p>Policies and Practices for retention and disposal of records:</p>	<p>Question 1i. 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?</p>	<p>N/A</p>
<p>Authority for maintenance of the system:</p>	<p>Question 1m. What is the authority to collect information?</p> <p>Contact OGC for legal authorities verification.</p>	<p>N/A</p>
<p>SORN Narrative Statement; Question 6. Provide OMB clearance numbers, expiration dates, and titles of any OMB approved information collected requirements contained in the system of records, or the titles and dates of submission for any pending requests made to OMB.</p>	<p>Question 1n. Does this information system or project have an active and approved Office of Management and Budget (OMB) Control Number?</p> <p>Contact your designated PRA Representative</p>	<p>N/A</p>
<p>Categories of Records in the System:</p> <p>Please see SORN Reference Guide for formatting.</p>	<p>Question 2a. What PII will be collected or maintained on the information system or project?</p> <p>The information can also be leveraged from Question 1c.</p>	<p>N/A</p>
<p>If applicable: Authorities for maintenance of the system: List the authorities for the SSN collection.</p>	<p>Question 2b. If the SSN is collected, please list the proper HUD authority to do so.</p>	<p>N/A</p>
<p>Administrative, Technical, and Physical Safeguards:</p> <p>Please see SORN Reference Guide</p>	<p>Question 3a. How will the PII be secured?</p>	<p>N/A on CSAM</p> <p>Responsibility of ISSO is to ensure security safeguards are answered appropriately and documentation within CSAM is current.</p>

		Responsibilities of SOs to scope the privacy controls accurately.
Policies and Practices for storage of records: Please see SORN Reference Guide	Question 3c. Where is PII stored within the system?	N/A on CSAM Responsibility of ISSO to ensure security safeguards are answered appropriately and documentation within CSAM is current