

Privacy Impact Assessment (PIA) Reference Guide

The Department of Housing and Urban Development (HUD) Privacy Impact Assessment (PIA) Reference Guide is designed to help HUD Program Offices understand the HUD PIA requirements and process, including supporting information on how to fill out and submit the PIA for approval.

A PIA is to be conducted for all HUD information systems or electronic collections that collect, maintain, use, and / or disseminate personally identifiable information (PII) about members of the public, Federal employees, and contractors.

Program Offices are responsible for filling out the PIA form in its entirety and ensuring the information is as correct and complete as possible before sharing for review and approvals. When filling out the PIA form, please be sure to use [plain language](#) and be as concise as possible. For additional questions, please contact the HUD Privacy Office.

Front Matter: System Information

A thorough and clear overview gives the reader the appropriate context to understand the responses in the PIA.

PIA Question	PIA Reference Guidance
HUD Information System	Provide the name of the information system or electronic collection.
HUD Division Name	Identify which HUD division to which the PIA applies.
CSAM ID	Include the CSAM identification (ID) number.

Section 1: PII Description Summary

Note that this is the only section of the PIA that is publicly released.

#	PIA Question	PIA Reference Guidance
A	The PII is	Identify the source from which the PII is collected.
B	The PII is in a/an	Identify whether the PIA is for a new, existing, or modified information system / collection.
C	Describe the purpose of this HUD information system or project, including the types of personal information about individuals collected in the system.	<p>A thorough and clear overview gives the reader the appropriate context to understand the system / collection's purpose. The overview should contain elements of the following:</p> <ul style="list-style-type: none">• The purpose of the program, IT system, or technology and how it relates to the program office and agency mission.• A general description of the information in the IT system.• A description of a typical transaction conducted on the IT system.• A general description of the modules and subsystems, where relevant, and their functions.
D	Why the PII is collected and / or what is the intended use of the PII?	Identify why the particular information in identifiable form is collected, maintained, used, or disseminated in the system is necessary to the program's or agency's mission, including why it is collected and how it will be used.
E	Do individuals have the opportunity to object to the collection of their PII?	Identify if the person from or about whom information is collected can decline to provide the information, along with the mechanism and reasoning for the response.

#	PIA Question	PIA Reference Guidance
F	Do individuals have the opportunity to consent to the specific uses of their PII?	Identify whether an individual may consent to specific uses or the consent is given to cover all uses (current or potential). Include the mechanism or reasoning for the response.
G	When an individual is asked to provide PII, a Privacy Act Statement (PAS) and / or a Privacy Advisory must be provided	Identify the type of notice provided and the exact wording included within it.
H	With whom will the PII be shared through data exchange, both within your HUD Division and outside your Division?	Identify if PII will be shared and the audience(s).
I	Source(s) of the PII collected is/are?	Identify the types of source(s) and list the individual, entity, or entities providing the information identified.
J	How will the information be collected?	Identify the ways the information is collected.
K	Does this HUD information system or project require a Privacy Act System of Records Notice (SORN)?	Identify if the system collects information and utilizes a personal identifier.
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?	Identify the categories of information (either Record or Non-Record) stored on the system (or in paper form) according to the HUD's 67 Form 'Record Series Inventory Worksheet'. This form identifies the information managed in the system and identifies the appropriate disposition authority, whether approved or pending, with the National Archives and Records Administration. This may be an Agency Specific Disposition found in the HUD 2225.6 or the General Records Schedule (GRS). Section L is completed by the program office copying the information in Fields 24-26 of the HUD-67, and populating the PIA. See RIM SOP on HUD-67, or contact your RMLO for further instruction or guidance."
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.	List the full legal authority for operating the system, including the authority to collect the information
N	Does this information system or project have an active and approved Office of Management and Budget (OMB) Control Number?	Identify if the information system has an active and approved OMB control number.

Section 2: PII Risk Review

#	PIA Question	PIA Reference Guidance
A	What PII will be collected or maintained on the information system or project?	Identify and list all information in identifiable form that is collected and stored in the system.
B	If the SSN is collected, please list the proper HUD authority to do so.	Identify if the SSN is collected and, if so, please reference the policy and procedures.

Section 3: PII Security Measures

#	PIA Question	PIA Reference Guidance
A	How will the PII be secured?	Identify how the PII is secured, including as much relevant detail as possible.
B	What additional measures/ safeguards have been put in place to address privacy risks for this information system or electronic collection?	Identify any additional safeguard information.
C	Where is PII stored associated with the system?	Identify how the information is stored. Indicate the assessment and authorization status, including the date it was granted.

