Privacy Impact Assessment (PIA) Review Workflow

Per the HUD Privacy Handbook, the HUD Privacy Office maintains an up-to-date PIA inventory and conducts an annual PIA review process. Privacy Liaison Officers (PLOs) are responsible for initiating and tracking individual PIAs, as well as for supporting the annual review of their Offices’ PIA inventory. Below are details on the PIA workflow and PIA review schedule.

**PIA Workflow**

1. PLO coordinates within Program Office to compile required information for the HUD PIA template. Be sure to use plain language & be as concise as possible. For additional questions, please contact the HUD Privacy Office. All PIAs must be sent to privacy@hud.gov.

2. Please refer to the most current PIA Template to ensure you’re using the correct form. PIAs submitted in the wrong template will be returned to the PLO for re-submission.

3. PLO reviews the PIA, provides a signature, and collects below required signatures. These stakeholders must sign the PIA before the PLO can submit to the Privacy Office:
   - System Manager (or Shared Drive / SharePoint Admin(s), based on PII storage
   - ISSO
   - Record Management Liaison Officer
   - HUD Records Officer

4. Once completed and signed, PLOs submit PIA to the Privacy Office via the Privacy inbox (privacy@hud.gov).

5. Privacy Office reviews documentation for accuracy, completion and necessary signatures.
   - If additional information is needed, Privacy Office coordinates with the PLO as needed

6. Privacy Office routes PIA to Chief Privacy Office (CPO) for review and signature.

7. Privacy Office assesses the system for privacy controls.

8. CPO routes PIA to Senior Agency Official for Privacy (SAOP) for review and signature.

9. Finalized PIA is uploaded to HUD’s public website by contacting the Privacy Web Manager.

10. Privacy Office notifies PLO of the published PIA via email.

**Annual PIA Review Schedule**

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<tr>
<th>Action</th>
<th>Timing</th>
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<tr>
<td>PLOs should initiate the annual PIA review and inform System Owners in their respective offices to review and update all PIAs that were first established more than one year ago (as of June 1st of the current year). All necessary updates and changes must be submitted to the Privacy Office by June 30th.</td>
<td>June 1st</td>
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<td>PLOs should conduct a status check for which offices have and have not submitted modified or updated PIAs. PLOs should send submission reminders to System Owners who have not submitted their updated PIAs.</td>
<td>No Later Than (NLT) June 15th</td>
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<td>System Owners in each office should complete their review and ensure any systems with significant changes and/or expired PIAs are updated, completed and submitted to the Privacy Office at <a href="mailto:privacy@hud.gov">privacy@hud.gov</a>.</td>
<td>NLT June 30th</td>
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- **PIA template and guide are available on the public HUD Privacy Website**
- **Only PLOs should communicate with HUD Privacy on PIA related issues / questions.**
- **HUD Privacy cannot ensure PIAs will be reviewed unless they are received at Privacy@hud.gov.**