U.S. Department of Housing and Urban Development

PERSONALLY IDENTIFIABLE INFORMATION MINIMIZATION PLAN
August 2020

Document Change History

Issue	Date	Pages Affected	Description
Version 1.0	August 2020	All	Establishes HUD's Personally Identifiable Information (PII) minimization efforts through policies and procedures for all HUD personnel

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Introduction and Purpose

The U.S. Department of Housing and Urban Development (HUD) *PII Minimization Plan* details priorities, strategy, and implementation mechanisms for PII identification and minimization. As mandated by Office of Management and Budget (OMB) Circular A-130, "agencies shall take steps to eliminate unnecessary collection, maintenance, and use of Social Security numbers". Per the Fair Information Practice Principles (FIPPs), agencies should use the collection of principles when evaluating information systems, processes, programs and activities that affect individual privacy. HUD's Privacy Office prioritizes eliminating the collection of unauthorized or unnecessary PII as a foundation for a robust Privacy Program. PII identification and minimization will be achieved through prioritization of: creating inventories of HUD's PIAs, SORNs, and PII, including procedures, timelines, and compliance mechanisms to ensure their maintenance; annual HUD-wide Privacy Data Questionnaires; and ongoing training and awareness campaigns.

The HUD Privacy Office considers the following when prioritizing minimization efforts:
- Enterprise impact of forms/systems collections
- Time to develop and release system change
- Level of potential risk of misuse associated with the PII
- Level of public scrutiny
- Level of oversight review
- HUD program priorities
- Cost estimates

Definitions

As defined in HUD Privacy Office Directive 01-00: *Privacy Policy and PII Handling*, PII refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Set forth below is a non-exclusive list of information that may constitute PII on its own or in combination with other information:
- Full name
- Home address
- Business Contact Information (see definition)
- Personal e-mail address
- Social security number
- Passport number
- Driver's license number
- Certificate number
- Credit card numbers
- Date of birth
- Telephone number
- Log in details
- Personnel number
- Vehicle identifier or serial number
- Photograph or video identifiable to an individual
- Biometric information
- Medical information
- Criminal history

- Other information related to an individual that may directly or indirectly identify that individual (e.g., salary, performance rating, purchase history, call history, etc.)

PII Minimization Plan of Action

HUD's Privacy Program works to identify and minimize PII holdings through these supporting efforts, with emphasis on appropriate PII security and handling. HUD will focus on form collections of PII that are entered into systems to identify PII and ensure that the PII holding is accurate, timely, relevant, and complete.

PIA Inventory

A Privacy Impact Assessment (PIA) is a record of how HUD collects, stores, protects, shares, and manages PII. A PIA is required for all HUD information systems that develops, procures, or uses information technology to create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII. PIAs include information on what PII is on the system, who has access to the PII, and what controls are in place to protect the information. Per Privacy Office Memorandum 02-00: *Authorization to Operate (ATO) and PIA Requirements to Launch Information System into Production*, PIAs are required for each HUD information system, general support system, or electronic collection. As such, they are an integral input to the overall HUD PII inventory and identification efforts as PIAs address:

- What information is to be collected
- Why the information is collected
- The intended use of the information
- With whom the information will be shared
- How the information will be secured
- What choices the agency made regarding an IT system or collection of information as a result of performing a PIA

Per Privacy Office Memorandum 02-00, *Authorization to Operate (ATO) and Privacy Impact Assessment (PIA) Requirements to Launch Information System into Production*, all new systems, existing systems, and new information requests that involve PII, a PIA must be submitted in order to comply with Federal regulations and to secure and protect critical HUD assets, including department information systems and data. The Privacy Office will ensure that PIAs are complete and accurate, and track HUD's PIAs in a repository. The Privacy Office will update the repository annually by reviewing current HUD systems and forms that collect PII to ensure that a PIA is conducted and that each PIA is relevant and accurate.

SORN Inventory

Each System of Records Notice (SORN) describes what, why and how HUD collects, maintains, uses and disseminates records in the system. Some systems maintain information on HUD employees while others maintain information from or about individuals outside of HUD. The SORN allows questions to be raised and resolved before the system is put into effect and ensures that privacy considerations have been addressed. SORNs serve as an important part of the PII identification and minimization efforts as they identify the purpose of the PII HUD collects and whether it can be reduced to the minimum necessary for the proper performance of agency functions.

All HUD information systems, general support systems, and electronic collections that contain a group of records from which information is retrieved by the name of an individual, or by any number, symbol, or other unique identifier assigned to that individual are required to have a SORN. The Privacy Office will ensure that all SORNs are maintained within the HUD SORN Inventory which will be updated annually. The Privacy Office will use the SORN Inventory to gain insight into HUD's PII holdings and controls

which will support the overall effort on informing the PII inventory.

Privacy Data Questionnaire

The HUD Privacy Data Questionnaire is designed to identify PII holdings across the Department through considering:

- **Business processes** in place requiring the handling and storage of sensitive data, particularly PII;
- **Information systems** used to store sensitive data; and
- **PII** stored and handled by those information systems.

The Questionnaire was created for Privacy Liaison Officers (PLOs) to report annually on their PII holdings and mitigating controls, ensure adherence to retention schedules, and take action to address any deficits in PII holdings and handling. This will drive PII minimization as determinations are made about what PII is necessary and which can be disposed of, in accordance with HUD guidance.

Maintaining an Ongoing PII Inventory

The HUD Privacy Office will create and maintain the inventory of HUD's PII both for tracking purposes as well as to inform ongoing PII minimization efforts. It will be informed by the PIA inventory, SORN inventory, annual data questionnaire, coordination with Records Management, and other related efforts. ATO kickoffs and their accompanying PIAs will inform the inventory on an ongoing basis, as processed by the Privacy Office analysts. Additionally, as HUD retires systems or forms, the Privacy Officer will remove systems from the inventory list and will revise the relevant PIAs and SORNs to reflect changes to systems collecting or maintaining PII. The CPO will require Program Offices, represented by their respective PLOs, to support the annual review of the inventory for confirmation that their information is current and accurate. The PII inventory will provide insights into HUD's overall PII holdings and inform minimization strategy.

Training and Awareness

The Privacy Office's awareness campaigns focus on informing HUD audiences of their PII responsibilities, as well as their role in supporting HUD's overall PII minimization efforts. These include:

- **Organizational Awareness** focused on increasing the Department's overall awareness of the importance of PII identification and minimization, including personnel's role in supporting these efforts.

- **Role-Based Education** for PLOs, as well as personnel responsible for collecting and using PII. This will identify the primary roles within HUD related to PII collection and use and develop awareness materials targeted for that specific role, as well as providing users with information on their roles and responsibilities in the PII identification and minimization efforts, as well as guidance on proper PII handling, storage, and how to contact the Privacy Office with questions. Audiences include PLOs, those with elevated access privileges, and managers / supervisors.

- **Executive Communications.** Executive communications to key stakeholders identifying status of the PII identification and minimization efforts, including PIA and SORN updates, information on the questionnaires and annual PII reviews, training and communications roll-outs, and other relevant updates on supporting activities.