

# SORN Maintenance and Communication Workflow

The Privacy Office ensures compliance with the Privacy Act of 1974 by developing and maintaining SORNs. Below describes the Privacy Office's SORN development and communication workflow.

## What is SORN?

A system of records is a group of any records under the control of any agency from which information is retrieved by a unique identifier, including but not limited to an individual's name, Social Security number, symbol, or other identifier assigned to the individual. It is HUD's policy to **publish a SORN in the Federal Register** for any agency-maintained information technology (IT) or paper file system that contains PII and retrieves information by a personal identifier.

## SORN Development and Communication Workflow



### Prepare and Submit



### Review and Approve




### Finalize and Publish

1. **PLO coordinates within respective Program Office** to compile required information for the HUD SORN template.

A SORN is needed when the Program Office performs one of the following:

- Establishes a new system that retrieves PII
- Modifies an existing system that retrieves PII
- Performs annual certifications with ATO (Authority to Operate) process due to expire in three years

 Privacy Office provides the SORN template to PLOs via email when a need for a SORN is identified during the PIA process and the annual certifications with ATO process.

2. Once complete, **PLOs submits SORN to the Privacy Office via the Privacy inbox.**



**Only PLOs should communicate with the Privacy Office on SORN related issues and questions.**

3. Privacy Office reviews documentation for completion. If additional information is needed, **Privacy Office coordinates and communicates with the PLO as needed to ensure SORN document is complete.**

4. Once document is complete, Privacy Office coordinates with PLO to obtain **letter and narrative statement to OMB and Congress** explaining the need for a new system of records.

5. Privacy Office routes SORN, letter and narrative statement to **CPO for review and SAOP for signature.**

6. Once reviewed and signed, Privacy Office **submits SORN, letter and narrative statement to OMB and Congress** via OMB's request processing database (ROCIS).

7. **OMB reviews, requests Privacy Offices for additional information if needed, and provides approval** to SORN within 30 days or more.

8. Once SORN is approved by OMB, with notification provided via ROCIS database, **Privacy Office delivers signed official SORN** to OGC's Legislative and Regulation Office for publishing in the Federal Register.

9. Once published, **OGC's Legislative and Regulation Office POC notifies the HUD Privacy Office via email** that SORN is published with the Federal Register number and link.

10. **Finalized SORN is uploaded to HUD's public website** by contacting the Privacy Web Manager. SORNs are accessible at [https://www.hud.gov/program\\_offices/officeofadministration/privacy\\_act/pia/fednotice/SORNs\\_LoB](https://www.hud.gov/program_offices/officeofadministration/privacy_act/pia/fednotice/SORNs_LoB).

- Privacy Offices also uploads SORN to Privacy SharePoint.

11. Privacy Office **notifies PLO of published document** via email.