



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-3000

MEMORANDUM FOR: Distribution

DATE ISSUED: May 2023

FROM: LaDonne L. White, Chief Privacy Officer

SUBJECT: Privacy Office Memorandum 05-00, Elimination of “Good Faith” System of Record Notice (SORN) and change to Authorization To Operate (ATO) Process

I first want to thank you all for your tremendous work and strides that have contributed to the success of the HUD Privacy Program. It has been a long road to get where we are, so my hat is off to all. Moving forward, the HUD Privacy Office is introducing a few new changes to the SORN and ATO process. This will ensure we meet the minimum required standards set for the program and to ensure continued success going forward.

The first change, effective immediately, HUD Privacy will no longer use the term “Good Faith” when describing a SORN reviewed by the Privacy Office. This term was used to describe a SORN approved by the Privacy Office to complete a PIA. This was the only use of the term. Going forward, a Program Office will complete a Privacy Impact Assessment (PIA) after the SORN (if applicable) has been published in the Federal Register. This change will meet the following goal: Eliminate the back and forth of the PIA for changes. To follow the SORN, the PIA must coincide with the SORN. By waiting for the SORN to be published, the PIA can be created from an approved OMB document vice a draft.

The second change was discussed at the May 10th PLO meeting. HUD Privacy Office will only acquire Senior Agency Official for Privacy (SAOP) signature/approval on the ATO Letter once applicable privacy artifacts (PIA/SORN (if applicable) have been updated and uploaded into Cyber Security Assessment Management (CSAM). This is to ensure all PIA and SORN, if applicable artifacts are current in CSAM.

This change may present the notion it will delay the ATO process, but I assure you it will not. If Program Offices properly plan and allot enough time, they should see no difference in the timeline for ATO approvals.

Please contact the Privacy Office at privacy@hud.gov with any concerns or questions.

FOR DISTRIBUTION: All HUD Privacy Liaison Officers