

# **U.S. Department of Housing and Urban Development**

---

## **Office of Public and Indian Housing and Office of Multifamily Housing Programs**

### **Enterprise Income Verification (EIV) System**

#### **Privacy Impact Assessment**

**October 5, 2017**

## Abstract

The Enterprise Income Verification (EIV) system is a web-based computer system of reports, which functions out of the Real Estate Assessment Center, Office of Public and Indian Housing (PIH). EIV contains employment and income information on individuals participating in HUD's rental assistance programs. The reports in EIV assist HUD in making sure that the right rental assistance benefits go to the right persons. This is important because, annually, Congress appropriates limited Federal resources to serve as many eligible rental assistance families as possible. The technology that EIV provides supports the determination and verification of various resident information and income that public housing agencies (PHAs) and owner agents (OAs) use in determining rental assistance. Currently, EIV reports available through the Java and Oracle technologies are being converted to utilize MicroStrategy. This Privacy Impact Assessment (PIA) is being done to evaluate this conversion.

## Overview

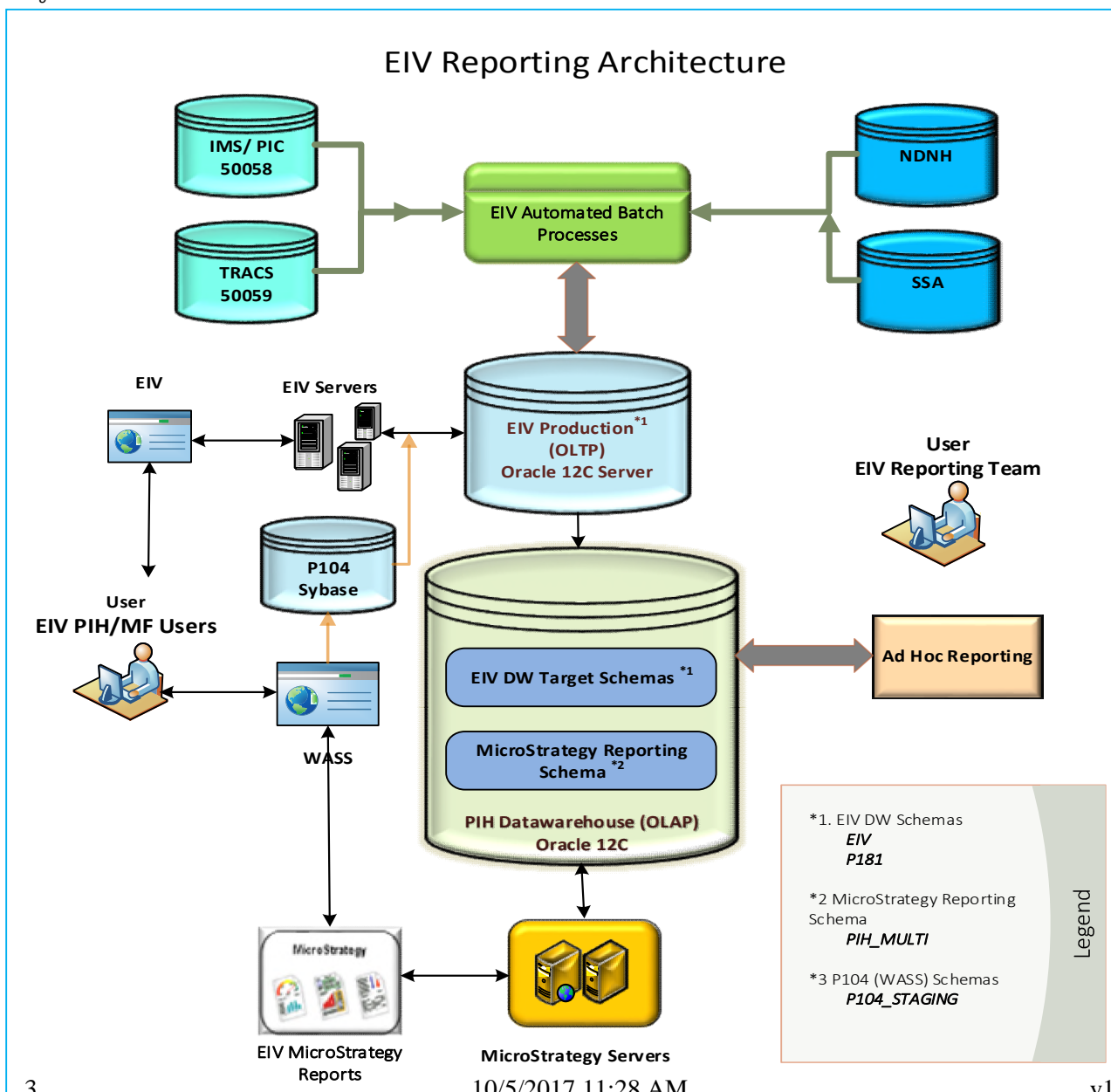
Each year, PIH and the Office of Multifamily (MF) Housing provide rental housing assistance in the form of subsidies to more than 3.3 million PIH families and 1.3 million MF families, respectively. To verify that these subsidies go to the right person, HUD utilizes the EIV system. The EIV system is a component of the Rental Housing Integrity Improvement Project (RHIP), which is a Secretarial initiative designed to reduce income, rental errors, and improper payments in the administration of Public Housing, Section 8 Housing Choice Voucher, and MF Housing programs. To ensure that rental subsidies are paid on behalf of eligible families and are of the correct amount, the income of each household receiving or applying for rental housing assistance must be verified. Verification is important to assure that the identities of recipients of rental housing assistance are correct and valid, that there is no duplication of benefits, and that families demonstrate their ability to comply with HUD program requirements.

To serve PIH and MF Housing programs, EIV uses personal identifiers collected from internal HUD systems and from data sharing agreements between external agencies to facilitate computer matching of resident data and supplemental employment and benefit information. The Inventory Management System, Public and Indian Housing Information Center (IMS/PIC), and the Tenant Rental Assistance Certification System (TRACS) are the HUD systems that provide the personal identifiers. The data sharing agreements exist between the Social Security Administration (SSA) and the National Directory of New Hires (NDNH). The data provided via the data sharing agreements is in the form of quarterly wage and unemployment compensation benefits, employment information (employer name, address, Federal Employer Identification Number, and new hires (Federal Form W-4) and information regarding program participants.

The data in EIV can be displayed in the form of a variety of reports. EIV reports currently available through the Java and Oracle technologies are being converted to utilize MicroStrategy. MicroStrategy is a business intelligence software used to generate reports and organize information. The software is beneficial to any business that must evaluate lots of data and needs reports and analysis to make business decisions. Converting EIV reports to MicroStrategy reduces the maintenance cost for the EIV system over a period and will allow PIH and MF to address several Office of Inspector General (OIG) findings and recommendations related to PHA improper payments and internal controls.

One of the key EIV data conversion tools being created in MicroStrategy is the Income Validation Tool (IVT). The purpose of the IVT is to identify the rental housing assistance payment errors associated with intentional tenant misreporting of income. The IVT can be used in the same manner as the current reports available in EIV. HUD data assets, PIH existing infrastructure, and hardware and software have been utilized to create the IVT to provide a comparison of the income information reported in IMS/PIC and TRACS for determining the accuracy of income data reported by PHA households and OAs in their portfolio. IVT will allow PIH and OA's to make better decisions for determination of rental subsidy and the degree of improper payments in the rental subsidy programs. The tool will enable the user to drilldown the income information from a PHA/HUB area to a household level providing the source of the income. During the conversion, the IVT tool will be available to a test group of users consisting of PHAs and OAs. Figure 1 below provides a high-level summary of this overview and a snapshot of the EIV Reporting Architecture as it relates to the conversion to MicroStrategy.

Figure 1



## Section 1.0 Authorities and Other Requirements

### 1.1 What specific legal authorities and/or agreements permit and define the collection of information by the project in question?

The information HUD collects is protected by the following legislation and regulations:

- [44 U.S.C Chapter 35, Sub Chapter II](#): provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets. The purposes of this subchapter are to (1) provide a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets; (2) recognize the highly networked nature of the current Federal computing environment and provide effective governmentwide management and oversight of the related information security risks, including coordination of information security efforts throughout the civilian, national security, and law enforcement communities; (3) provide for development and maintenance of minimum controls required to protect Federal information and information systems; (4) provide a mechanism for improved oversight of Federal agency information security programs, including through automated security tools to continuously diagnose and improve security; (5) acknowledge that commercially developed information security products offer advanced, dynamic, robust, and effective information security solutions, reflecting market solutions for the protection of critical information infrastructures important to the national defense and economic security of the nation, that are designed, built, and operated by the private sector; and (6) recognize that the selection of specific technical hardware and software information security solutions from among commercially developed products should be left to individual agencies.
- [42 U.S.C. § 653\(j\)\(7\)](#), found at <https://www.law.cornell.edu/uscode/text/42/653>, discusses information comparisons for housing assistance programs. Specifically, (A) (Furnishing of information by HUD[.] Subject to subparagraph (G), the Secretary of Housing and Urban Development shall furnish to the Secretary of Health and Human Services, on such periodic basis as determined by the Secretary of Housing and Urban Development in consultation with the Secretary of Health and Human Services, information in the custody of the Secretary of Housing and Urban Development for comparison with information in the National Directory of New Hires, in order to obtain information in such directory with respect to individuals who are participating in any program under subparagraph (A) subject to the below considerations; (B) Requirement to seek minimum information. The Secretary of Housing and Urban Development shall seek information pursuant to this section only to the extent necessary to verify the employment and income of individuals described in subparagraph (A); and must adhere to the additional provisions governing; (C) Duties of the Secretary; (D) Use of information by HUD; (E) Disclosure of information by HUD; (F) Reimbursement of [Health and Human Services costs. The Secretary of Housing and Urban Development shall reimburse the Secretary of Health and Human Services, in accordance with subsection (k)(3), for the costs incurred by the Secretary [of Health and Human Services] in furnishing the information requested under this paragraph; and (G) Consent.

- [42 U.S.C. § 653\(k\)\(3\)](https://www.law.cornell.edu/uscode/text/42/653), found at <https://www.law.cornell.edu/uscode/text/42/653>, discusses fees for information furnished to State and Federal agencies. Specifically, a State or Federal agency that receives information from the Secretary of Housing and Urban Development pursuant to this section or section 652(m) of this title shall reimburse the Secretary for costs incurred by the Secretary in furnishing the information, at rates which the Secretary determines to be reasonable (which rates shall include payment for the costs of obtaining, verifying, maintaining, and comparing the information)
- .

## 1.2 What Privacy Act System of Records Notice(s) (SORN(s)) apply to the information?

Please see Figure 1 below

FR Doc E9-21087

[Federal Register: September 1, 2009 (Volume 74, Number 168)]  
 [Notices]  
 [Page 45235-45240]  
 From the Federal Register Online via GPO Access [wais.access.gpo.gov]  
 [DOCID:fr01se09-92]

-----  
 DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5291-N-04]

Privacy Act of 1974; Amendment to an Existing System of Records,  
 Enterprise Income Verification (EIV), HUD/PIH-5

AGENCY: Office of the Chief Information Officer, HUD.

ACTION: Notification of an amendment to an existing System of Records,  
 Enterprise Income Verification (EIV), HUD/PIH-5.

-----

Figure 1

### 1.3 Has a system security plan been completed for the information system(s) supporting the project?

Between February 4 and March 28, 2006, an assessment team within the Office of Information Technology (OITS) reviewed security documentation, analyzed vulnerability scans, interviewed personnel and observed system administrators executing various commands related to the P181 – Enterprise Income Verification (EIV). Based on the state of security controls assessment, at the appropriate level of effort, it was the judgment of the Security Assessment Validation official that P181 – EIV complies with the general requirements of OMB Circular A-130, Appendix III, and with the minimum security requirements defined for sensitivity systems in accordance with Federal Information Processing Standard 199 and the NIST Special Publication 800-53, revision 4. An Authority to Operate was issued on March 31, 2016. The next due date is in 3 years, March 20, 2019.

### 1.4 Does a records retention schedule approved by the National Archives and Records Administration (NARA) exist?

The records maintained by program administrators in implementing the EIV system and the IVT are consistent with HUD Records Schedule 35, items 67–74, which have been created to meet legal requirements for records management as administered by the National Archives and Records Service, pursuant to 44 U.S.C. § 31.

### 1.5 If the information is covered by the Paperwork Reduction Act (PRA), provide the OMB Control number and the agency number for the collection. If there are multiple forms, include a list in an appendix.

The information is covered by the PRA under the OMB Control number 2577-0267. The information collection requirements contained in this notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. § 3520) and assigned OMB control number(s) 2577-0267. Please also refer to the form HUD -9887.

## Section 2.0 Characterization of the Information

### 2.1 Identify the information the project collects, uses, disseminates, or maintains.

The project collects, uses, disseminates and maintains the following personal identifiers and sensitive information.

#### Personal Identifiers:

<b>X</b>	Name
<b>X</b>	Social Security Number (SSN):  The full SSN is disclosed on the following reports:

PIH EIV Reports

- Income Discrepancy Report in the individual household level, and Detail Report
- Existing Tenant Search- Tenant Data Access Report
- Identity Verification Report
- Debts Owed to PHAs Enter/Update Information Page PHA level
- Debts Owed to PHAs and End of Participation Report tenant level

MF EIV Housing Reports

- Existing Tenant Search
- Tenant Data Access Report at the HQ level
- Identity Verification Report at the Contract, and Project levels
- Multiple Subsidy Report at the Contract and Project levels under tenant link on the Summary tab
- Income Discrepancy Report under Verification reports

The last four digits of the SSN are displayed on the following reports:

PIH EIV Reports

- Head of Household Summary Report and Income Report
- By Reexamination Month - Summary Report and Income Report Detail Report
- By Reexamination Month - New Hires Report Summary Report and Detail Report
- By Reexamination Month –Failed Verification Report
- By Reexamination Month –No Income Report
- Multiple Subsidy Report -- Summary Report and Detail Report
- New Hires Report – Summary Report and Detail Report
- Debts Owed to PHAs and Termination Report
- Debts Owed to PHAs Enter/Update Information Page (Household Level)- Debts Owed to PHAs and End of Participation Report (Tenant Level)
- Tenant Data Access Report (printed report)

MF EIV Reports

- Income Information Reports: By Contract, Project and Head of Household under Summary and Details tab
  - Income Report
  - Income Discrepancy Report
  - No Income Reported on 50059
  - No Income Reported by HHS and SSA
  - New Hires Report

	<ul style="list-style-type: none"> <li>▪ Verification Reports: <ul style="list-style-type: none"> <li>○ Existing Tenant Search</li> <li>○ Multiple Subsidy Report under Summary and Details tab</li> <li>○ Deceased Tenant Report</li> <li>○ New Hires Report under Summary and Details tab</li> </ul> </li> <li>▪ Tenant Data Access Report at the Contract and Project levels</li> </ul> <p><u>IVT MicroStrategy Reports</u></p> <ul style="list-style-type: none"> <li>▪ Household Level Report</li> <li>▪ Member Level Report</li> <li>▪ Employment History Level Report</li> </ul> <p><u>Regular &amp; Ad hoc EIV Reports</u></p> <p>Regular and ad hoc reports using EIV data will be distributed for use by HUD staff in the oversight of the PIH and MF Housing tenant recertification process implemented by PHAs and owners and agents (OAs). PHAs and MF Housing OAs also will be provided information regarding tenant IDs where identification information, including SSN, could not be verified by the SSA. No income information will be obtained or displayed if the tenant ID was not verified by SSA.</p>
	<p><u>Other identification number (specify type):</u></p>
<p><b>X</b></p>	<p>Birth date: Only the year of birth is displayed on the following reports:</p> <p><u>PIH EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Head of Household Summary Report and Income Report</li> <li>▪ By Reexamination Month - Income Report Detail</li> <li>▪ By Reexamination Month - New Hires Report Detail</li> <li>▪ New Hires Report – Detail Report</li> <li>▪ By Reexamination Month – Income Report Summary</li> <li>▪ By Reexamination Month - New Hire Report Summary</li> <li>▪ New Hires Report – Summary Report</li> <li>▪ Multiple Subsidy Report – Summary Report</li> <li>▪ Multiple Subsidy Report – Detail Report</li> </ul> <p><u>MF EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Income Information: By Contract, Project, and Head of Household under summary and details tab <ul style="list-style-type: none"> <li>○ Income Report</li> <li>○ New Hires Report</li> </ul> </li> </ul>



	<ul style="list-style-type: none"> <li>▪ Verification Reports: <ul style="list-style-type: none"> <li>○ Multiple Subsidy Report under Summary and Details tab</li> <li>○ Deceased Tenant Report</li> <li>○ New Hires Report under Summary and Details tab</li> </ul> </li> </ul> <p>The full Date of Birth is disclosed on the following reports:</p> <p><u>PIH EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Deceased Tenants Report</li> <li>▪ Identity Verification Report</li> </ul> <p><u>MF EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Identity Verification Report</li> </ul> <p><u>IVT MicroStrategy Reports</u></p> <ul style="list-style-type: none"> <li>▪ Household Level Report</li> <li>▪ Member Level Report</li> </ul>
<p><b>X</b></p>	<p>Home address: Tenant address as reported in IMS or TRACS is displayed on the following reports:</p> <p><u>PIH EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Household Income Details page and Household Summary page.</li> <li>▪ By Reexamination Month – Income Report Summary</li> <li>▪ By Reexamination Month – New Hire Report Summary</li> <li>▪ By Reexamination Month – Income Discrepancy – Summary Report</li> <li>▪ By Reexamination Month – Income Discrepancy – Detail Report</li> <li>▪ New Hires Report – Summary Report</li> <li>▪ Multiple Subsidy Report – Detail Report</li> <li>▪ Debts Owed to PHAs and End of Participation Report (Tenant Level)</li> <li>▪ Debts Owed to PHAs and Terminations Enter/Update Report Selection Page</li> </ul> <p><u>MF EIV Reports</u></p> <ul style="list-style-type: none"> <li>▪ Income Information: By Contract, Project, and Head of Household under summary and details tab <ul style="list-style-type: none"> <li>○ Income Report</li> <li>○ New Hires Report</li> </ul> </li> <li>▪ Verification Reports:</li> </ul>

	<ul style="list-style-type: none"> <li>○ Existing Tenant Search</li> <li>○ Multiple Subsidy Report</li> <li>○ New Hires Report under Summary and Details tab</li> </ul>
	Home telephone
	Personal email address
	Fingerprint/ other “biometric”
X	Other (specify): Age The IVT MicroStrategy Member Level Report displays age
X	Comment: Identifiers of PIH program participants are extracted from the IMS/PIC system and imported into EIV. Identifiers of MF Housing program participants are extracted from TRACS for use by EIV. Access to the household level of the EIV Income Discrepancy Report for PIH is more restricted than access to summary levels of that report. MicroStrategy extracts data from PIH Data Warehouse.

**Personal/ Sensitive Information:**

	Race/ethnicity
	Gender/sex
	Marital status
	Spouse name
X	Number of children: The IVT MicroStrategy Tool displays age on the Member Level Report, which could in some cases provide for the identification of the number of children per household.
X	<p>Income/financial data (specify type of data, such as salary, Federal taxes paid, bank account number, etc.):</p> <p>EIV contains quarterly wage, unemployment compensation benefits, and new hires (Federal form W-4) data for household members who are 18 years of age or older and Social Security benefit information for all recipient household members, regardless of age.</p> <p>IVT MicroStrategy Tool contains the following income/financial data:</p> <p><u>Household Level Report</u></p> <ul style="list-style-type: none"> <li>▪ Annual Reported Income from HUD Systems</li> <li>▪ Annual Income Reported by SSA &amp; NDNH</li> </ul> <p><u>Member Level Report</u></p> <ul style="list-style-type: none"> <li>▪ Annual Reported Income from HUD Systems</li> <li>▪ Annual Income Reported by SSA &amp; NDNH</li> </ul>

	<u>Employment Level Report</u> <ul style="list-style-type: none"> <li>▪ Annual Reported Income from HUD Systems</li> <li>▪ Annual Income Reported by SSA &amp; NDNH</li> <li>▪ Unemployment Benefits (Current Quarter + Prior Quarter)</li> <li>▪ Wage Income (Current Quarter + Prior Quarter)</li> <li>▪ SSA Income (Current Quarter + Prior Quarter)</li> <li>▪ Pay Start and Pay End Dates</li> <li>▪ Employee First Name and Last Name</li> <li>▪ Employer Name</li> <li>▪ Employer Address, City, State</li> <li>▪ Income Amount</li> </ul>
X	<p>Employment history:</p> <p>EIV contains wage amount for a given quarter, the date an employee was hired (from Federal Form W-4), employer name, employer address, employer telephone number (if available), and the employer's Federal Employer's Identification Number (FEIN) or equivalent code for Federal agencies as employers.</p> <p><u>IVT Tool Employment Level Report</u> contains:</p> <ul style="list-style-type: none"> <li>▪ Pay Start Date</li> <li>▪ Pay End Date</li> <li>▪ Employer Name</li> <li>▪ Employer Address, City, State</li> <li>▪ Annual and Quarterly wage amounts</li> </ul>
	Education level
	Medical history/ information
X	Disability: EIV does state if the Social Security Administration has found the person to be disabled, however, EIV does not state the nature of the disability.
	Criminal record
	Other (specify):
	None
	Comment:

## 2.2 What are the sources of the information and how is the information collected for the project?

Data is imputed into IMS/PIC and TRACS by HUD system users and data is also shared with HUD via an agreement with SSA and the National Directory of New Hires (NDNH). The information from HUD Systems and SSA and NDNH is matched and batched through the EIV Automated Batch Process. After the batching is complete, the matched and batched data is moved to the EIV Production Database and the PIH Data Warehouse. When the user logs into EIV or the Income Validation Tool ( IVT) through a secure Web Application Secure Systems (WASS) connection based on user role, the information is extracted from the Data Warehouse to the EIV System (if logged into EIV) or to the MicroStrategy Server to IVT (if logged into IVT).

2.3 Does the project use information from commercial sources or publicly available data? If so, explain why and how this information is used.

The project does not use information from commercial sources or publicly available data.

2.4 Discuss how accuracy of the data is ensured.

The data provided in the IMS/PIC and TRACS is verified against the information provided by SSA & NDNH. EIV and the IVT Systems collect the personal identifiers from the internal HUD Systems and compare the information against the data from SSA and NDNH, which are outside of HUD using an automated batch processes. Based on the results from the batch processes, reports are automatically generated to provide information for PHAs and OAs. Information provided by the individual is checked against data in the EIV System and IVT to determine if individual’s level of rental assistance is accurate.

2.5 Privacy Impact Analysis: Related to Characterization of the Information

<b>Privacy Risk:</b>	<b>Mitigation:</b>
Unauthorized access to PII Data	<ul style="list-style-type: none"> <li>▪ Unauthorized access is reduced by restricted access by job functions, location, property assignment, and the use of user IDs/passwords.</li> <li>▪ Record access at the record-level is identified and tracked by user ID and date of access.</li> <li>▪ Built-in logs track access to sensitive data. Security administrator reviews these logs daily. Any intrusions (unauthorized access attempts) are to be reported to management, HUD HITS National Help Desk, and to the Office of Inspector General (OIG), as appropriate.</li> <li>▪ Actions in the user administration module for PIH and in WASS for MF Housing are logged so that a user’s level of access at a given date and time can be ascertained should there later be an issue.</li> </ul>
Access to disks, tapes, and printouts that contain personal information	<ul style="list-style-type: none"> <li>▪ The personal information can be printed out by a user, and maintained in locked cabinets and/or files.</li> <li>▪ Access to tenant information is defined by role assignment granted based on work requirements for that access. Some roles receive no access to tenant data. Some public housing roles receive only summary discrepancy data at an entity level. Those who have access to EIV tenant data have received instructions (backed up by on-site audits) requiring that printouts, disks containing downloads, and work</li> </ul>

	<p>products containing individual information be locked up when not in use.</p> <ul style="list-style-type: none"> <li>▪ HUD makes information available for download by HUD business partner users (PHAs for PIH programs and owners and their agents and contract administrators for MF Housing programs): The individual identifier information is derived from the HUD business partner submissions.</li> <li>▪ HUD’s business partners for PIH are the PHAs and for MF Housing these are the property owners and their agents (which include some PHAs). As a service to HUD’s business partners, HUD has created the EIV downloadable reports that contain tenant Privacy Act data.</li> </ul>
<p>Access to PII Data when an employee leaves</p>	<p>How soon is the user ID terminated (1 day, 1 week, 1 month, unknown)?</p> <p>PHAs and MF Housing OAs are encouraged to terminate the user ID immediately. In addition, PHAs are asked to certify twice per year as to the continuing need and scope of user system access. OAs and contract administrators also certify their employees twice per year. OAs and contract administrators also are certified twice per year when acting as users but annually when acting as EIV Coordinators. In each case, if there is no certification within 30 days of expiration date, the user’s access is automatically terminated by the system.</p> <p>How do you know that the former employee no longer has access to your system? (Explain your procedures or describe your plan to improve):</p> <p>For PIH, the user’s WASS ID is not found in the EIV User Administration module. For MFH, the WASS ID will not have EIV roles.</p>

## Section 3.0 Uses of the Information

The following questions require a clear description of the project's use of information.

### 3.1 Describe how and why the project uses the information.

The project uses the information to determine the eligibility and suitability for participation in federally assisted rental housing programs. It is used for verification of family annual income during mandatory recertifications and for monitoring and oversight of owner/agent and PHA operations. Personal identifiers are required to facilitate ongoing computer matching efforts and for use by the HUD Office of Inspector General (OIG) in the detection of fraud, waste, and abuse in HUD's rental assistance programs. The SSN is necessary to be able to compare the common data elements across the internal HUD systems and the external agencies, such as NDNH and SSA, since that is the main key unique identifier.

### 3.2 Does the project use technology to conduct electronic searches, queries, or analyses in an electronic database to discover or locate a predictive pattern or an anomaly? If so, state how HUD plans to use such results.

EIV disseminates to HUD and OAs the information available from SSA and NDNH. Detailed analysis was performed on the IVT to:

- (1) utilize an updated methodology to identify cases of unreported income (Figure 2 below).
- (2) identify potentially compromised SSNs and cases of identity theft.

The EIV system utilizes the information gathered from SSA and NDNH, disseminating into numerous specially designed reports to be used as third party verification as it relates to the tenant-provided information. The reports capture:

- EIV system takes SSA and NDNH income and compares it with income provided by the tenant on the HUD form 50059 in TRACS. EIV determines if income discrepancy exists.
- New Hires report will inform the user that the tenant has started working, which might affect his reported income.
- Verification report determines if the PII information provided to PHA or OA belongs to the individual requesting subsidy.
- Deceased Tenant report identifies if a tenant is reported as deceased.
- Multiple Subsidy and Existing Tenant report determines if a tenant is receiving multiple subsidy's and where.
- 

The use of these automated reports is designed specifically to assist HUD in meeting the Rental Housing Integrity Improvement Project's (RHIP) goal of ensuring that the *right benefits go to the right person*, and supports Executive Order 13520, Reducing Improper Payments.

User friendly electronic technology allows the user to search, drill down, and query with less effort when reviewing these cases. This results in improved data quality for HUD. The resulting records

will be in the current individual record. The derived results from the tool shall be used by the PHAs and OAs to report to the respective fraud departments for taking necessary action

Figure 2

Household Level Dashboard Report – Field Calculation				
Report Level	Reported Income on Form 50058 (A)	Annualized Income Reported by SSA and NDNH (B)	Total Unreported Income (C)	% of Unreported Income (D)
Household		Annualized Income = (Quarter of recertification earnings + Quarter Prior to Recertification earnings) * 2	Annualized Income Reported by SSA and NDNH (B) - Reported Income on Form 50058 (A)	(C / B) * 100

Member Level Dashboard Report – Field Calculation Formulae				
Report Level	Reported Income on Form 50058 (A)	Annualized Income Reported by SSA and NDNH (B)	Quarter of Recertification Earnings (C)	Quarter Prior to Recertification Earnings (D)
Member		Annualized Income = (Quarter of recertification earnings + Quarter Prior to Recertification earnings) * 2	(Wage Income + SSA Income + Unemployment Benefit) received during certification quarter	(Wage Income + SSA Income + Unemployment Benefit) received during quarter prior to certification

### 3.3 Are there other program offices with assigned roles and responsibilities within the system?

HUD HQ staff, HUD field office, HUD Office of Public and Indian Housing (PIH), HUD Office of Multifamily Housing and HUD Office of Inspector General.

### 3.4 Privacy Impact Analysis: Related to the Uses of Information

Please refer to Section 2.5 for the details on types of controls that are in place to ensure that information is handled in accordance with the uses described above.

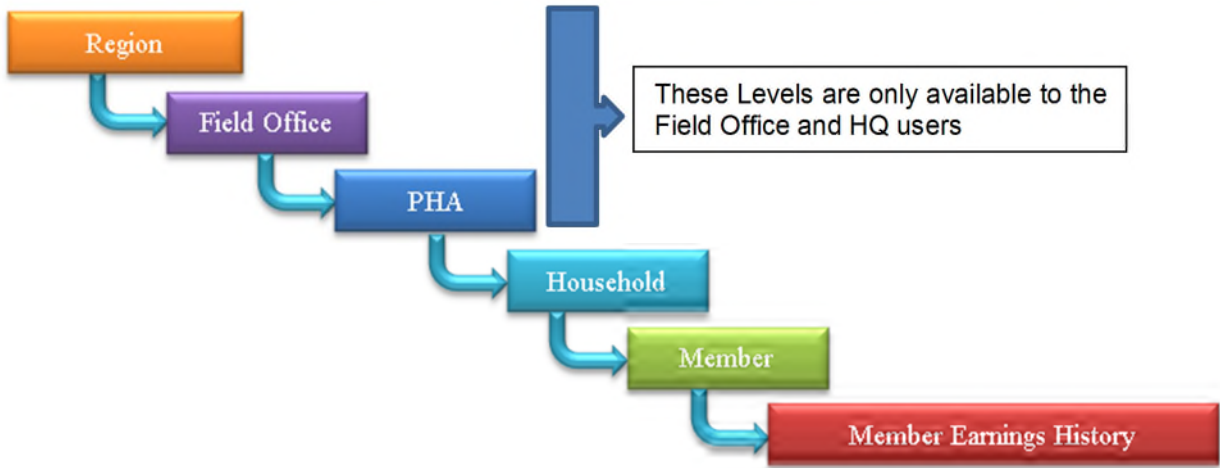
There are strict controls in place to get an ID approved for access to EIV and IVT. The scope of access is determined by the kind of user role assigned to a user and that user’s organization. Thus, IDs issued to the PHA staff are restricted to allow data access only on those tenants within a PHA’s jurisdiction. MF Housing users’ access is per the contracts or properties of the owner or agent that the owner or agent has approved them to work on. HUD user access is determined by their organization. Field office users access data within the jurisdiction of the field office. Hub users access data within the jurisdiction of the Hub.

The IVT restricts various levels of the hierarchy drilldown by making some levels only available to field offices and HUD users (See Figure 3 below).



Figure 3

Exhibit below displays the various levels and hierarchy of information available in the tool.



## Section 4.0 Notice

The following questions seek information about the project's notice to the individual about the information collected, the right to consent to uses of said information, and the right to decline to provide information.

### 4.1 How does the project provide individuals notice prior to the collection of information? If notice is not provided, explain why not.

Multifamily (MF) OAs are governed by 24 CFR § 5.230, "Consent by assistance applicants and participants," and, therefore, are required to obtain written consent from individuals on HUD-9887 and HUD-9887-A forms. The OA is also required to provide to the tenant the HUD-9887/A Fact Sheet, the *Residents Rights and Responsibilities* brochure, and the *EIV & You* brochure.

Form HUD-9886, *Authorization for the Release of Information/Privacy Act Notice*, is the official document that is provided to individuals prior to data collection. A copy of the form can be found at: [https://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_11848.pdf](https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11848.pdf). Each member of the household who is 18 years of age or older must sign the notice/form. Additional signatures must be obtained from new adult members joining the household or whenever members of the household become 18 years of age. Persons who apply for or receive assistance under the following programs are required to sign this notice/form:

- PHA-owned rental public housing
- Turnkey III Homeownership Opportunities
- Mutual Help Homeownership Opportunity
- Section 23 and 19(c) leased housing
- Section 23 Housing Assistance Payments
- HA-owned rental Indian housing
- Section 8 Rental Certificate
- Section 8 Rental Voucher
- Section 8 Moderate Rehabilitation

HUD is required to protect the income information it obtains in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a. HUD may disclose information (other than tax return information) for certain routine uses, such as to other government agencies for law enforcement purposes, to Federal agencies for employment suitability purposes and for determining housing assistance. The Housing Authority is also required to protect the income information it obtains in accordance with any applicable state privacy law. HUD and HA employees may be subject to penalties for unauthorized disclosures or improper uses of the income information that is obtained based on the consent form. Private owners may not request or receive information authorized by this form.

### 4.2 What opportunities are available for individuals to consent to uses, decline to provide information, or opt out of the project?

Failure to sign HUD Form-9886 may result in the denial of eligibility or termination of assisted housing benefits, or both. Denial of eligibility or termination of benefits is subject to the grievance procedures of the Housing Agency/Authority (HA) and Section 8 informal hearing procedures. Failure of tenant to sign form HUD-9887 and HUD 9887A requires the OA to abide by 24 CFR 5.232, Penalties for failing to sign consent forms, at (a), Denial or termination of benefits. In accordance with the provisions governing the program involved, if the assistance applicant or participant, or any member of the assistance applicant's or participant's family, does not sign and submit the consent form as required in 24 CFR 5.230, then:

- (1) The processing entity shall deny assistance to and admission of an assistance applicant.
- (2) Assistance to, and the tenancy of, a participant may be terminated.

### 4.3 Privacy Impact Analysis: Related to Notice

Sufficient notice is provided via forms HUD-9886, HUD-9887, and HUD 9887-A to applicants and participants regarding the authority and law governing the information sought and the purposes and uses of the information. The forms also cover instances in which an applicant or tenant or member of the tenant family fails to execute form HUD-9886, HUD-9887 and HUD-9887-A. In accordance with these forms, tenants are given an opportunity to contest the PHA's or OA's determination and/or the information obtained in accordance with the PHA's grievance policies.

PHAs are required to administer their programs consistent with HUD mandates and regulations, such as those contained in form HUD-9886, HUD-9887, and HUD-9887-A; HUD Systems User Agreement, EIV Rules of Behavior and User Agreement form (Appendix 4); their administrative plans; occupancy policies; and state law. Forms HUD-9886, HUD-9887, and HUD-9887-A include sections regarding the uses of the information and the sources of information that PHAs and OAs will obtain from third-party sources regarding wage, unemployment compensation, Social Security benefits, etc. The forms also clarify the sources of information, compel PHAs and OAs to safeguard the information obtained, and include the penalties for unauthorized disclosures. HUD monitors program administrator's compliance in the use of the EIV System and its data. EIV contains a listing of reports that are compiled, maintained, and based on PHA and OA completion of family and income information contained on the forms HUD-50058 and -50059 that are completed during recertification's. The information, provided by PHAs and OAs and contained in HUD's PIC and TRACS systems is further supported by data sharing agreements with HHS and SSA. The information contained in PIC and TRACS is used for remote monitoring regarding specific areas of regulatory deficiencies in which the information provided by PHAs on form HUD-50058 and OAs on form HUD-50059 is compared to information derived from HHS and SSA. The program regulations, in general, and forms HUD-9886, HUD-9887, and HUD-9887-A, provide for redress that includes access and correction of applicant and tenant information that may be erroneous. PHAs and OAs obtain wage and benefit information, from third-party sources, including data resulting from HUD's data sharing agreements with HHS and SSA, that although verified, may not be up to date or that may otherwise be erroneous. In cases where the information may be erroneous, PHA and OA grievance procedures, and forms HUD-9886, HUD-9887, and HUD-9887-A, provide an avenue for applicant(s) and tenant(s) to contest the information.

Security of the information and retention and/or disposal of applicant-tenant information is specified in each of the above data sharing agreements and are also enumerated in PHA and OA administrative plans and occupancy policies.

## Section 5.0 Data Retention by the project

The following questions are intended to outline how long the project retains the information after the initial collection.

### 5.1 Explain how long and for what reason the information is retained.

The records maintained by program administrators in implementing the EIV system and the IVT are consistent with HUD records schedules that have been created to meet legal requirements for records management as administered by the National Archives and Records Service pursuant to National Archives and Records Administration Act of 1984 (44 U.S.C. § 101); 36 CFR part 1228 and 36 CFR part 1230 issued by the National Archives and Records Administration (NARA); 18 U.S.C. § 2071; 18 U.S.C. § 641; 18 U.S.C. §§ 793, 794, and 798; The Federal Records Act of 1950 (44 U.S.C. § 3102); and the 1976 Federal Records Management Amendments to the Federal Records Act of 1950. The records are to be maintained for at least 5 years or as prescribed by the applicable program administrator's records control policy or procedures, whichever is longer. In addition, EIV records (both electronic and paper) and the information contained in them must be used only for their intended purpose (the administration of Federal rental assistance programs and determination of tenant income eligibility) to avoid unintentional disclosures of personal private information, which would be a violation the Privacy Act of 1974. Additional information regarding HUD record retention/disposition requirements can be found in HUD Handbook 2228.2, *General Records Schedules*, and HUD Handbook 2225.6, *HUD Records Disposition Schedules*.

Official file copies of program records and user administration and EIV security administration records are only to be disposed of not sooner than within 5 years of creation and following the approved program administration schedule. The MF EIV reports are required to be retained for the term of residency plus 3 years. Please refer to the following document for more details:

<http://www.hud.gov/offices/pih/programs/ph/rhiip/docs/eivsecguidepha.pdf>

### 5.2 Privacy Impact Analysis: Related to Retention

EIV and IVT only collect PII that is directly relevant and necessary to accomplish the specified purpose(s) and only retain PII for as long as is necessary to fulfill the specified purpose(s). The IVT tool contains less PII than EIV, however, information provided by the individual is checked against data in the EIV system and IVT before a decision is made about the individual's level of rental assistance. EIV and IVT data should be destroyed as soon as it has served its purpose or as prescribed by the program's administrative policy and procedures (See Appendices 9 and 10). All EIV originals and any documents created in association with their use can be either shredded or burned to prevent the reconstruction of the contents.

It is essential that the methods used to dispose of records are thorough. This applies to both the destruction of record copies pursuant to records schedules as well as copies of records that are no longer needed (See HUD Handbook Nos. 2225.6 REV-1, CHG-49; 2228.1; and 2229.1 for HUD records disposition schedules and scheduling for automated systems.)

<http://www.hud.gov/offices/pih/programs/ph/rhiip/docs/eivsecguidepha.pdf>

Because of the high risk of combining PII data in EIV and the **vast amount of personal and sensitive information**, the following mitigation strategies are in place to minimize the exposure of data obtained in the EIV system.

The following table provides a list of privacy risks and mitigation strategies employed:

<b>Privacy Risk:</b>	<b>Mitigation:</b>
Unauthorized access to PII Data	<ul style="list-style-type: none"> <li>▪ Unauthorized access is reduced by restricted access by job functions and the use of user IDs/passwords.</li> <li>▪ Record access at the record-level is identified and tracked by user ID and date of access.</li> <li>▪ Built-in logs track access to sensitive data. Security administrator reviews these logs daily. Any intrusions (unauthorized access attempts) are to be reported to management, HUD HITS National Help Desk and to the Office of Inspector General (OIG), as appropriate.</li> <li>▪ Actions in the user administration module for PIH and in Web Application Secure Systems (WASS) for MF Housing are logged so that a user’s level of access at a given date and time can be ascertained should there later be an issue.</li> </ul>
Access to disks, tapes, and printouts that contain personal information,	<ul style="list-style-type: none"> <li>▪ The personal information, which is maintained in locked cabinets and/or files, can be printed out by a user.</li> <li>▪ Access to tenant information is defined by role assignment granted based on work requirements for that access. Some roles receive no access to tenant data. Some public housing roles receive only summary discrepancy data at an entity level. Those who have access to EIV tenant data have received instructions (backed up by on-site audits) requiring that printouts, disks containing downloads, and work products containing individual information be locked up when not in use.</li> <li>▪ HUD makes information available for download by HUD business partner users (PHAs for PIH programs and owner agents and their agents, and contract</li> </ul>

	<p>administrators for MF Housing programs). The individual identifier information is derived from the HUD business partner submissions.</p> <ul style="list-style-type: none"> <li>▪ HUD’s business partners for PIH are the PHAs and for MF Housing the business partners are the property owners and their agents (which include some PHAs). As a service to HUD’s business partners, HUD has created the EIV downloadable reports described that contain tenant Privacy Act data.</li> </ul>
<p>Access to PII Data when an employee leaves</p>	<p>How soon is the user ID terminated (1 day, 1 week, 1 month, unknown)?</p> <p>PHAs and MF Housing owners and agents are encouraged to terminate the user ID immediately. In addition, PHAs are asked to certify twice per year as to the continuing need and scope of user system access. Owners and agents and contract administrators also certify their employees twice per year. Owners and agents and contract administrators also are certified twice per year when acting as users but annually when acting as EIV Coordinators. In each case, if there is no certification within 30 days of expiration date, the user’s access is automatically terminated by the system.</p> <p>How do you know that the former employee no longer has access to your system? (Explain your procedures or describe your plan to improve)</p> <p>For PIH, the user’s WASS ID is not found in the EIV User Administration module. For MFH, the WASS ID will not have EIV roles.</p>

## Section 6.0 Information Sharing

The following questions are intended to describe the scope of the project information sharing external to the Department. External sharing encompasses sharing with other Federal, state, and local governments and private sector entities.

6.1 Is information shared outside of HUD as part of the normal agency operations? If so, identify the organization(s) and how the information is accessed and how it is to be used.

The information is also shared with PHAs or Section 8 property owners/agents. PHAs that administer Housing Choice Voucher and Public Housing programs and MF owner agents and the employees of the agents that administer a HUD rental housing assistance program will have access to the information, which is to be used in determining tenant income as part of determining program participation eligibility and level of eligible rental housing subsidy. PHA and MF information also is shared with HUD's OIG for audits and investigations. PHA information can be shared with the Department of Justice, as necessary. MF information sharing is restricted to identified entities mentioned in HHS Computer Matching Agreement, section VIII; and SSA, section VI. All the above parties may use independent auditors under contract, in which case the auditors may have access.

6.2 Describe how the external sharing noted in 6.1 is compatible with the SORN noted in 1.2.

Note which routine uses support the sharing described in 6.1 related to normal business operations. The external sharing noted above is used to verify income.

External sharing of the information is noted in the routine use section of the SORN. The routine use section provides the uses of records maintained in the system, including categories of users and purposes of such uses: In addition to the uses cited in the section of this document titled "Purposes," other routine uses may include:

1. To Federal, state, and local agencies (e.g., state agencies administering the state's unemployment compensation laws, state welfare and food stamp agencies, U.S Office of Personnel Management, U.S. Postal Service, U.S. Department of Defense, HHS, and SSA): to verify the accuracy and completeness of the data provided, to verify eligibility or continued eligibility in HUD's rental assistance programs, and to aid in the identification of tenant errors, fraud, and abuse in assisted housing programs through HUD's tenant income computer matching program.
2. To individuals under contract to HUD, or under contract to another agency with funds provided by HUD, for the preparation of studies and statistical reports directly related to the management of HUD's rental assistance programs, to support quality control for tenant eligibility efforts requiring a random sampling of tenant files to determine the extent of administrative errors in making rent calculations, eligibility determinations, etc., and for processing certifications/recertifications.

3. To PHAs, OAs, and contract administrators: to verify the accuracy and completeness of tenant data used in determining eligibility and continued eligibility and the amount of housing assistance received.
4. To PHAs, OAs, and contract administrators: to identify and resolve discrepancies in tenant data.
5. To PHAs: information related to debts owed to PHAs and participant's termination from a PIH program, to determine an applicant's suitability for tenancy in a PIH housing program.
6. To researchers affiliated with academic institutions, with not-for-profit organizations, or with Federal, state or local governments, or to policy researchers, without individual identifiers—name, address, SSN—for the performance of research and statistical activities on housing and community development issues.
7. To HUD staff, HUD contractors, independent public auditors and accountants, PHAs, and contract administrators for conducting oversight and monitoring of program operations to determine compliance with applicable laws and regulations and for financial reporting requirements.
8. To the Federal Emergency Management Agency (FEMA): to identify existing families that participate in a HUD rental assistance program and are currently receiving housing assistance. HUD may provide FEMA with the following information about the HUD-assisted family: (1) The name, address, and contact information of the PHA currently assisting the family; (2) the effective date of the last transaction the PHA conducted with the family; (3) family composition information, including household member names and dates of birth; and any other information from the form HUD-50058 that may assist FEMA in determining eligibility of assistance.
9. Additional disclosure for purposes of facilitating responses and remediation efforts in the event of a data breach. A record from a system of records maintained by this Department may be disclosed to appropriate agencies, entities, and persons when: (1) The Department suspects or has confirmed that the security or confidentiality of information in a system of records has been compromised; (2) The Department has determined that as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of systems or programs (whether maintained by the Department or another agency or entity) that rely upon the compromised information; and (3) The disclosure made to such agencies, entities, and persons is reasonably necessary to assist in connection with the Department's efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm.

### 6.3 Does the project place limitations on re-dissemination?

#### Safeguarding EIV Data

The information processed by the EIV and IVT systems includes, but may not be limited to, income data about private individuals. It may identify such information as Social Security number (SSN), address, and employment information. Once information from the EIV system becomes a part of a system maintained by the program administrator, that system and the information it contains becomes the responsibility of the program administrator. This section focuses on the



procedures to be followed when EIV data becomes part of the program administrator's case files as part of the recertification process.

As a condition of receiving the EIV data, program administrators must establish and maintain certain safeguards designed to prevent unauthorized use of the information and to protect the confidentiality of that information.

The program administrator's security officer, or other designated staff, will have the responsibility of ensuring compliance with the program administrator's security policies and procedures outlined in this document. These responsibilities include:

- Maintaining and enforcing the security procedures.
- Keeping records and monitoring security issues.
- Communicating security information and requirements to appropriate staff, including coordinating and conducting security awareness training session.
- Conducting a quarterly review of all User IDs issued to determine if the users still have a valid need to access the EIV data and taking the necessary steps to ensure that access rights are revoked or modified, as appropriate.
- Reporting any evidence of unauthorized access or known security breaches to the PHA executive director and taking immediate action to address the impact of the breach including, but not limited to, prompt notification to appropriate authorities, including the HUD field office's public housing director.

## Limiting Access to EIV Data

The program administrators should restrict access to EIV data only to persons whose duties or responsibilities require access. Appendix 5 provides a copy of the EIV Access Authorization Form. The program administrators should maintain a record of users who have approved access to EIV data. Further, the program administrators should revoke the access rights of those users who no longer require such access or modify the access rights if a change in the user's duties or responsibilities indicates a change in the current level of privilege – see Section 2.1.2 – System Administrators ensure that users sign the EIV Rules of Behavior and User Agreement form (Appendix 4) which provides general instructions on the appropriate use of the EIV resources and apply to all program administrators and contractors. EIV data should not become misplaced or available to unauthorized personnel. Files containing EIV information should be color-coded or labeled clearly with the following statement “Confidential” or “For Official Use Only.” To avoid inadvertent disclosures, the program administrator may keep the EIV information separate from other information and files.

Please refer to the following EIV security procedures document for more details on how the program administrators should safeguard the information provided by the EIV system:

<http://www.hud.gov/offices/pih/programs/ph/rhiip/docs/eivsecguidepha.pdf>

## 6.4 Describe how the project maintains a record of any disclosures outside of the Department.

EIV has built-in logs that track access to sensitive data. The EIV security administrator reviews these logs daily. Any intrusions (unauthorized access attempts) are to be reported to management, HITTS National Help Desk, and OIG, as appropriate. Usage of the reports by the PHAs and the OAs is tracked within the system database. HUD usage, PHA usage, and MF usage reports are available to the administrators for monitoring the access of PII information. The EIV security procedures document at the following URL provides specific details on how the program administrators should safeguard the information provided by the EIV system: <http://www.hud.gov/offices/pih/programs/ph/rhiip/docs/eivsecguidepha.pdf>

## 6.5 Privacy Impact Analysis: Related to Information Sharing

Sharing of PII with departments and agencies outside of HUD is done by Memorandum of Understanding (MOU) and Interagency agreements. Specifically, for this project agreements exist with SSA and the National Directory of New Hires (NDNH). Sharing of MF data obtained through the HHS and SSA Computer Matching Agreement (CMA) is governed through the HHS CMA, section VIII; and SSA, section VI. The following table provides a list of privacy risks and mitigation strategies employed:

<b>Privacy Risk:</b>	<b>Mitigation:</b>
Unauthorized access to PII Data	<ul style="list-style-type: none"> <li>▪ Unauthorized access is reduced by restricted access by job functions and the use of user IDs/passwords.</li> <li>▪ Record-access at the record level is identified and tracked by user ID and date of access.</li> <li>▪ Built-in logs track access to sensitive data. Security administrator reviews these logs daily. Any intrusions (unauthorized access attempts) are to be reported to management, HUD HITS National Help Desk and OIG, as appropriate.</li> <li>▪ Actions in the user administration module for PIH and in WASS for MF Housing are logged so that a user’s level of access at a given date and time can be ascertained should there later be an issue.</li> </ul>
Secured access to disks, tapes, and printouts that contain personal information and are locked in cabinets when not in use	<ul style="list-style-type: none"> <li>▪ The personal information can be printed out by a user, which is maintained in locked cabinets and/or files.</li> <li>▪ Access to tenant information is defined by role assignment granted based on work requirements for that access. Some roles receive no access to tenant data. Some public housing roles receive only</li> </ul>

	<p>summary discrepancy data at an entity level. Those who have access to EIV tenant data have received instructions (backed up by on-site audits) requiring that printouts, disks containing downloads, and work products containing individual information be locked up when not in use.</p> <ul style="list-style-type: none"> <li>▪ HUD makes information available for download by HUD business partner users (PHAs for PIH programs and OAs and their agents and contract administrators for MF Housing programs). The individual identifier information is derived from the HUD business partner submissions.</li> <li>▪ HUD’s business partners for PIH are the PHAs and for MF Housing are the property owners and their agents (which include some PHAs). As a service to HUD’s business partners, HUD has created the EIV downloadable reports described that contain tenant Privacy Act data.</li> </ul>
<p>Access to PII Data when an employee leaves</p>	<p>How soon is the user ID terminated (1 day, 1 week, 1 month, unknown)?</p> <p>PHAs and MF Housing owners and agents are encouraged to terminate the user ID immediately. In addition, PHAs are asked to certify twice per year as to the continuing need and scope of user system access. OAs and contract administrators also certify their employees twice per year. OAs and contract administrators also are certified twice per year when acting as users but annually when acting as EIV Coordinators. In each case, if there is no certification within 30 days of expiration date, the user’s access is automatically terminated by the system.</p> <p>How do you know that the former employee no longer has access to your system? (Explain your procedures or describe your plan to improve).</p> <p>For PIH, the user’s WASS ID is not found in the EIV User Administration module. For MF Housing, the WASS ID will not have EIV roles.</p>

## Section 7.0 Redress

The following questions seek information about processes in place for individuals to seek redress, which may include access to records about themselves, ensuring the accuracy of the information collected about them, and/or filing complaints.

### 7.1 What are the procedures that allow individuals to access their information?

FOIA notice procedures are on the Department's FOIA website:

[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/foia/requests](https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/foia/requests)

Additional access procedures are documented by the official source systems and LRS SORN. Actions should follow the Department's guidelines identified within each SORN. The request should be submitted to the Department's FOIA office at the address below.

U.S. Department of Housing and Urban Development  
Freedom of Information Act Office  
451 7th Street, SW, Room 10139  
Washington, DC 20410-3000  
Facsimile: 202-619-8365

Multifamily guidance on correcting incorrect data can be found in the HUD Handbook 4350.3, *Occupancy Requirements of Subsidized Multifamily Housing Programs*, at chapter 4, section 4 and chapter 9, section 3

*\*All the data contained within EIV is directly or indirectly obtained from HHS, from SSA, and from the individual, which is submitted through the form HUD 50059 or 50058. Therefor HUD or their representatives can only encourage the individual to seek the correction from the source EIV that obtained the data.*

### 7.2 What procedures are in place to allow the subject individual to correct inaccurate or erroneous information?

The redress/access procedures for correcting inaccurate or erroneous information will be handled in the same manner as described by section 7. Multifamily guidance on correcting any incorrect data can be found in the HUD Handbook 4350.3, *Occupancy Requirements of Subsidized Multifamily Housing Programs*, section 4.

### 7.3 How does the project notify individuals about the procedures for correcting their information?

Individuals are notified by notice, published in the *Federal Register*, for the specific system. The redress/access procedures provide the individual with the ability to correct data within the originating HUD source systems. Refer to section 1.2 for the specific SORN indentifications and in this PIA's questions 7.1 and 7.2.

Additional Multifamily guidance on correcting incorrect data can be found in the HUD Handbook 4350.3, *Occupancy Requirements of Subsidized Multifamily Housing Programs*, at chapter 4, section 4 and chapter 9, section 3.

#### 7.4 Privacy Impact Analysis: Related to Redress

Individuals may be made aware of redress procedures through the notices described above in section 4 or through some other mechanism. This question (7.4) is meant to address the risk that, even if procedures exist to correct information, if an individual is not made fully aware of the existence of those procedures, then the benefits of the procedures are weakened significantly. The information used in EIV and IVT is collected through HUD systems. Families are served notice that any changes in the information not only need to be correct, but also updated with any changes. To provide effective redress, HUD does the following:

- Provides effective notice of the existence of a PII collection.
- Provides plain language explanations of the processes and mechanisms for requesting access to records
- Establishes criteria for submitting requests for correction or amendment.
- Implements resources to analyze and adjudicate requests.
- Implements the means of correcting or amending data collections.
- Reviews any decisions that may have been the result of inaccurate information.

## Section 8.0 Auditing and Accountability

The following questions are intended to describe technical and policy-based safeguards and security measures.

### 8.1 How does the project ensure that the information is used in accordance with stated practices in this PIA?

HUD OIG is essential to this work of EIV and IVT. OIG prevents and detects inefficiencies and wrongdoing by conducting independent and objective audits, investigations, and evaluations to improve HUD's operations. HUD employees are critical in this process as, routinely, OIG needs information from Department offices to conduct its work effectively. Without full, complete, and timely access to all information related to HUD programs and activities, OIG cannot fully determine how HUD or the recipients of funding from HUD are fulfilling their respective responsibilities.

Recently, in Fiscal Year 2016, OIG determined that HUD did not comply with the Improper Payments Recovery Act (IPERA) 2016-FO-0005. Following are the specific areas of noncompliance related to EIV for Fiscal Year 2015:

Finding 4: HUD did not fully comply with the reporting requirements in regards to an outstanding recommendation, 2014-FO-0004-002-H, from Audit Report 2014-FO-0004, which recommended that the Office of the Chief Financial Officer (OCFO) work with the Office of Public and Indian Housing (PIH) and the Office of Multifamily (MF) Housing Programs to determine annual improper payments HUD made to deceased tenants and report this amount as an additional source of improper payments in the Agency Financial Report (AFR). OCFO management disagreed with identifying deceased tenants as an additional source of improper payments in the AFR. OCFO stated, in its management decision, that the current studies intentionally do not include deceased tenants because they are handled through another method (the Enterprise Income Verification (EIV) system). This recommendation remains open; thus, HUD studies continue to exclude identifying and quantifying error associated with the failure to verify death data for proper reporting in table 2.

- In the final section of the audit report, the OIG reviewed the recommendations from Audit Report 2014-FO-0004, Compliance with the Improper Payments Elimination and Recovery Act of 2010 and the recommendations from Audit Report 2015-FO-0005, Compliance with the Improper Payments Elimination and Recovery Act of 2010, and as of May 13, 2016, and found that 9 of the 21 recommendations from Audit Report 2014-FO-0004 and 1 of the 6 recommendations from Audit Report 2015-FO-0005 remained open, with final action target dates between March 6, 2015, and August 31, 2018. Of these 10 open recommendations, management decisions had not been reached on 7. The 10 open recommendations are as follows:
  1. Report on MF Housing, PIH, and Section 8 program improper payment rates separately in the Agency Financial Report (recommendation 2016-FO-000-1G: no agreed-upon management decision or final action target date).
  2. Work with PIH and MF Housing to determine annual improper payments HUD made to deceased tenants, and report this amount as an additional source of

improper payments in the Agency Financial Report (recommendation 2014-FO-0004-2H: no agreed upon management decision or final action target date).

4. Reassess existing supplemental measures and corrective actions, and enhance or develop new supplemental measures and corrective actions to ensure that they target the root causes of errors identified in the improper payment studies (recommendation 2014-FO-0004-2A: recommendation is pending approval for revised management decision—no final action target date).

We recommended that the Deputy Assistant Secretary for MF Housing Programs:

5. Coordinate with all appropriate program officials when responding to OCFO's information requests, to ensure that all statements are accurate for the current fiscal year, to include but not be limited to updates to corrective action plans, internal controls in place, and information on any barriers the agency is experiencing.

6. Develop and execute formal plans to hold accountable program officials and processing entities (owners or administrators) responsible for improper payments (recommendation 2014-FO-0004-1M: recommendation is pending approval for revised management decision and extension of final action target date).

7. Reassess existing supplemental measures and corrective actions, and enhance or develop new supplemental measures and corrective actions to ensure that they target the root causes of errors identified in the improper payment studies (recommendation 2014-FO-0004-2D: recommendation is pending approval for revised management decision and extension of final action target date).

8. Periodically reevaluate the supplemental measures and corrective actions so that new and innovative ways to reduce improper payments are identified and implemented (recommendation 2014-FO-0004-2E: final action target date is August 31, 2016).

9. Work with the PIH's Real Estate Assessment Center to develop management-level reports in the EIV system that will allow MF Housing management to efficiently and effectively identify processing entities that are responsible for improper payments and develop policies and procedures to hold the owners/administrators identified accountable (recommendation 2014-FO-0004-2F: recommendation is pending approval for revised management decision and extension of final action target date).

We recommended that the Deputy Assistant Secretary for the Real Estate Assessment Center:

10. Work with PIH and MF Housing management to develop management-level reports in EIV that will allow PIH and MF Housing management to efficiently and effectively identify processing entities that are responsible for improper payments

(recommendation 2014-FO-0004-2G: recommendation is pending approval for revised management decision - no final action target date).

Creation of MicroStrategy reports and the IVT tool clear up several of the recommendations. The full report can be found at <https://www.hudoig.gov/sites/default/files/documents/2016-FO-0005.pdf>

In addition, MF utilizes Performance Based Contract Administration (PBCA), Traditional Contract Administrators, and HUD employees that perform Management Occupancy Reviews (MOR's) on a quarterly basis. The review consists of, but not limited to insure OAs are utilizing the EIV system and obtaining by the requirements set forth by regulation and the HUD Handbook 4350.3: Occupancy Requirements of Subsidized Multifamily Housing Programs.

## 8.2 Describe the privacy training that is provided to users and which is either generally or specifically relevant to the project.

Security awareness training is a crucial aspect of ensuring the security of HUD systems and data. Before granting employees and contractors access to information, each employee and contractor must be trained in HUD security policies and procedures. All employees having access to data are briefed annually on the program administrator's security policy and procedures that require their awareness and compliance. The program administrator security officer or designated staff record on a program administrator form or a record of Security Training all the users attending each briefing. On completion of security awareness training, program administrators confirm that employees or contractors who have access to data have completed a Rules of Behavior and User Agreement indicating that they are aware of the safeguards and responsibilities associated with using HUD systems. Further, program administrator employees should be advised of the penalties associated with the provisions of the Privacy Act of 1974, section 552(a), which makes unauthorized disclosure or misuse of tenant wage data a crime punishable by a fine of up to \$5,000. (See Section 1.3, Privacy Act Considerations, and Appendix 2, Criminal Penalties Associated with the Privacy Act). The program administrator's security officer may communicate security information and requirements to appropriate personnel using a variety of methods outside of the formal training and awareness sessions. These methods may include the following:

- Discussions at group and managerial meetings.
- Security bulletins posted throughout the work areas.

## 8.3 What procedures are in place to determine which users may access the information and how will the project determine who has access?

Web Application Secure Systems (WASS) is the security gateway for EIV and IVT and over 25 other HUD systems. Many individual users have a limited need for information on how to access the system and perform the roles assigned to them by a coordinator. Most people who use WASS are external users. An external user is a user who is not employed by HUD. These users access WASS through the external URL and, typically, have user IDs that begin with the letter "M", although they might have a User ID that begins with the letter "I". External users have access to the systems and access privileges that are available to those accessing WASS externally. An internal user is a user who is employed by HUD. These users access WASS through the internal URL and have user IDs that begin with the letter "H". Internal users have access to the system and



access privileges are available to those accessing WASS internally. Currently, both Internal and External users access the EIV System through a link under Secure Systems.

During the conversion to MicroStrategy, PHAs and OAs will need to login to WASS and then click on a URL/link to access the IVT. Please find the details in Figure 4 below.

Figure 4

User Type	Steps to access the Income Validation Tool
External PHA and MF Users	<ol style="list-style-type: none"> <li>1. Login to <a href="#">External Secure Systems</a> with M-ID and password.</li> <li>2. Once logged in, click on the <a href="#">PHA Level Income Validation Tool</a></li> <li>3. Owner/Agents log in at <a href="#">External User</a> link.</li> </ol>
Internal HUD HQ Users	<ol style="list-style-type: none"> <li>1. Login to <a href="#">Internal Secure Systems</a> with H-ID and password.</li> <li>2. Once logged in, click on the <a href="#">PHA Level Income Validation Tool</a></li> <li>3. Multifamily (MF) log in at <a href="#">Internal Users</a> link.</li> </ol>

#### 8.4 How does the project review and approve information sharing agreements, MOUs, new uses of the information, new access to the system by organizations within HUD and outside?

All external agreements with other agencies are reviewed by the business manager, IT manager, IT director, program office privacy officer, and PIH counsel and then sent to OGC for formal review.

#### Document Endorsement

I have carefully assessed the Privacy Impact Assessment (PIA) for **[Insert Name of IT System and/ or Information Collection Request]**. This document has been completed in accordance with the requirement set forth by the [E-Government Act of 2002](#) and [OMB Memorandum 03-22](#) which requires that PIAs be conducted for all new and/or significantly altered IT Systems, and Information Collection Requests.

#### ENDORSEMENT SECTION

Please check the appropriate statement.

- The document is accepted.**
- The document is accepted pending the changes noted.**
- The document is not accepted.**

Based on our authority and judgment, the data captured in this document is current and accurate.

---

**Program Area Manager**

**Steve Bolden**

Real Estate Assessment Center

Office of Public & Indian Housing

---

**Date**

---

**Program Area Manager**

**Stephen A. Martin**

Special Advisor for Program Management

Assisted Housing Oversight Division

---

**Date**

**10/05/2017**

---

**Marcus Smallwood, acting**

**Chief Privacy Officer**

Office of Administration

U. S. Department of Housing and Urban Development

---

**Date**