## Department of Housing and Urban Development (HUD) Privacy Impact Assessment (PIA)

Prescribing Authority: Public Law 107-347, Section 208(b). Complete this form for Department of Housing and Urban Development information systems or electronic collections (referred to as "electronic collections" for the purpose of this form) of information that collect, maintain, use, and / or disseminate Personally Identifiable Information (PII) about members of the public, Federal employees, and contractors. In the case where no PII is collected, the PIA will serve as a conclusive determination that privacy requirements do not apply to the system. Please be sure to use <a href="plain language">plain language</a> and be as concise as possible.

**HUD's PIAs describe:** (1) the legal authority that permits the collection of information; (2) the specific type of information used by the system; (3) how and why the system uses the information; (4) whether the system provides notice to individuals that their information is used by the system; (5) the length of time the system retains information; (6) whether and with whom the system disseminates information; (7) procedures individuals may use to access or amend information used by the system; and (8) physical, technical, and administrative safeguards applied to the system to secure the information.

Note: Program Offices utilizing Shared Drive and SharePoint locations to store information such as PII are required to conduct a PIA. Program Offices completing a PIA for PII storage in the HUD Shared Drive will use either CSAM ID 957, P207 Mainframe (IBM); CSAM 959, P209 LAN File Server; CSAM 962, P212 Mainframe; or CSAM 1098, X01 Windows Azure Public Cloud whereas the PIA for PII storage in SharePoint will use the CSAM 1095, D110 MS 0365 MT. After completion of all required information in the PIA, PIA are required to be routed to the Shared Drive Administrator and/or SharePoint Administrator for signature approval in addition to all the required signatures.

For further information and instructions on how to fill out the PIA, please see the PIA Reference Guide. Please submit all completed PIAs using the submission feature located at the bottom of page 7.

- 1. HUD INFORMATION SYSTEM:
- 2. HUD DIVISION NAME:
- 3. CSAM ID:

Section 1: PII Description Summary (For Public Release)

a. The PII collected is on/from: (Check all that apply)

From members of the general public

From a third-party source

From Federal employees and / or Federal contractors

No PII (Fill out 1c &11, then go to Section 4)

From vendors

Other (Please specify in the box below)

b. The PII is in a / an: (Check one)

**New HUD Information System** 

**Existing HUD Information System** 

New collection

Significantly modified HUD Information System (if selected,

Existing collection

please describe the modification in the box below)

c. Describe the purpose of this HUD information system or project, including the "types of personal information" collected within the system (Must be consistent with Section 2a).

d. Why is the PII collected and / or what is the intended use of the PII? (Check all that apply)

Verification
Identification
Authentication

Data Matching Mission-Related Use Administrative Use

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| e.          | Do individuals have the opportunity to object to the collection of their PII?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Yes                       | No           |
|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------------|
|             | If "Yes," describe the method by which individuals can object to the PII collection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                           |              |
|             | If "No," state the reason why individuals cannot object to the PII collection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                           |              |
| <b>f.</b> 1 | Do individuals have the opportunity to consent to the specific uses of their PII?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Yes                       | No           |
|             | If "Yes," describe the method by which individuals can give or withhold their consent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                           |              |
|             | If "No," state the reason why individuals cannot give or withhold their consent.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                           |              |
| g.          | When an individual is asked to provide PII, is a Privacy Act Statement (PAS) and / or Advisory provided? (Please provide the "actual wording" in the box below and check as appropriate  Privacy Act Statement  Privacy Notice  Privacy Advisory  Not App                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | te)                       | у            |
|             | With whom will the PII be shared through electronic data exchange, both within your doutside your Division? (Check all that apply)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | · HUD Di                  | vision       |
|             | ☐ Other HUD Office(s) / Division(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                           |              |
|             | ☐ Other federal agencies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                           |              |
|             | ☐ State & local agencies                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                           |              |
|             | ☐ Contractors (Include name of contractor and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                           |              |
|             | describe the language in the contract that safeguards PII in the box below.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                           |              |
|             | □ Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                           |              |
| i.          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | olicable)                 |              |
|             | ☐ Individuals ☐ Databases                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                           |              |
|             | ☐ Existing HUD information systems  ☐ Existing HUD information systems  Publicly available data if applica                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | ıble)(e.g., ol            | otained from |
|             | ☐ Other Federal information systems internet, news feeds, court record                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | , , <u> </u>              |              |
| j.          | How will the information be collected? (Check all that apply and list all Official Forms and their                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Titles, if a <sub>l</sub> | pplicable)   |
|             | ☐ Encrypted Email ☐ Telephone interview                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                           |              |
|             | ☐ Face-to-face contact ☐ Website / e-form                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                           |              |
|             | □ Fax □ Paper                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                           |              |
|             | ☐ Information sharing /system-to system ☐ Other (if selected, enter information and the content of the content | ation in the              | box)         |
|             | ☐ Official form                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                           | 2            |
|             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                           | _            |

## k. Does this HUD information system require a Privacy Act System of Records Notice (SORN)?

A SORN is required if the information system contains information about U.S. citizens or lawful permanent U.S. residents that is <u>retrieved</u> by name of another unique identifier. PIA and Privacy Act SORN information must be <u>consistent</u>.

## Yes No

If "Yes" enter SORN System Identifier:

If a SORN has not yet been published in the Federal Register, enter date of submission for approval. If "No" explain why the SORN is not required and how information is retrieved in the system.

- l. What is the National Archive and Records Administration (NARA) approved, pending, or General Records Schedule (GRS) disposition authority for the system or for the records maintained in the system? (Please consult Office of Records Management to ensure that the following information is accurate)
  - (1) NARA Job Number or GRS Authority:
  - (2) If pending, provide the date the SF-115 was submitted to NARA:
  - (3) Retention instructions:
- m. What is the authority to collect information? A Federal law or Executive Order must authorize the collection and maintenance of a system of records. For PII not collected or maintained in a system of records, the collection or maintenance of the PII must be necessary to discharge the requirements of a statue or Executive Order.

n. Does this Information System or E-Collection have an active and approved Office of Management and Budget (OMB) Control Number?

This number indicates OMB approval to collect data from 10 or more members of the public in a 12-month period regardless of form or format.

## Yes No Pending

If "Yes," list all applicable OMB Control Numbers, collection titles, and expiration dates.

If "No," explain why OMB approval is not required in accordance with proper HUD authority.

If "Pending," provide the date for the 60 and / or 30 day notice and the Federal Register citation.