

# Privacy Impact Assessment (PIA) and PII Confidentiality Impact Level (PCIL) Categorization Template Review Workflow

Per the HUD Privacy Handbook, the HUD Privacy Office maintains an up-to-date PIA inventory & conducts an annual PIA review process. Privacy Liaison Officers (PLOs) are responsible for initiating & tracking PIAs, as well as supporting the annual review of their offices' PIA inventory. Below are details on the PIA & PCIL Template (if applicable) review workflow & annual review schedule

PIA/PCIL Workflow



## **Prepare and Submit**



### **Review & Approve**



#### Finalize & Publish

- PLO coordinates within Program Office to compile required information for the HUD PIA & PCIL Categorization Template (if applicable). Use plain language & be concise. The PLO will communicate PIA & PCIL Template related questions to the HUD Privacy Office PIA Team.
- Refer to the most current PIA & PCIL Templates available on the
   <u>HUD Privacy Website</u>
   PIA & PCIL Templates submitted on outdated templates will be returned to the PLO to update & re-submit.
- 3. PLO will review the PIA & PCIL Template (*if applicable*) for accuracy, completion, signs, & collect the required stakeholders' signatures. The stakeholders must review & sign the PIA & PCIL Template (*if applicable*) before the PLO can submit to the HUD Privacy Office for review.
  - √ System Owner (SO)
  - √ Shared Drive / SharePoint Admin(s) based on PII storage

- ✓ Information System Security Officer
- √ Record Management Liaison Officer
- √ HUD Records Officer

**HUD Privacy Office.** 

√ Paperwork Reduction Act Liaison Officer

- Once PIA & PCIL Template (if applicable) are completed, PLO submits to the HUD Privacy Office inbox at privacy@hud.gov.
- PIA Team reviews for accuracy, completion & required signatures.
- 6. If additional information & updates are required, PIA Team coordinates with the PLO as needed.
- Once PIA & PCIL Template (if applicable) is determined to be accurate & complete, PIA Team will sign & route the approved PCIL Template to PLO to update CSAM w/rating & route PIA to Chief Privacy Officer (CPO) for review & signature.
- 8. CPO review, signs, & routes PIA to PIA Team.
- 9. PIA Team routes PIA to Senior Agency Official for Privacy (SAOP) for review & signature.
- 10. SAOP review, signs, & routes PIA to the PIA Team.

- 11. PIA Team routes the approved PIA to PLO to upload into CSAM for data integrity.
- 12. PIA Team routes a copy of the approved PIA to Privacy Controls Assessor to assess the system's privacy controls.
- PIA Team contacts the Privacy Web manager to publish the approved PIA(s) to <u>HUD Privacy</u> <u>Website</u>.
- PIA & PCIL Template review schedule is First In/First Out, with a 2-week initial review period
- CPO & SAOP review & signature: 5-7 business days each
- Privacy Controls Assessment: 3-5 business days
- PIA How to Guide is available on the <u>HUD Privacy</u> <u>Website</u> & PLO MS Teams page
- For additional questions, please contact the HUD Privacy Office at <u>privacy@hud.gov</u>

#### **Annual PIA/PCIL Review Schedule**

PLOs should initiate the annual PIA review for certification & inform SO(s) in their respective office to review & update PIA & complete PCIL Template (if applicable) on the 1-year anniversary of the initial approved PIA.

For PIA(s) that were first established **more** than one year ago (as of June 1st of the current year), PLOs should initiate the annual PIA review for certification, inform SO(s) in their respective offices to review, update PIA & complete PCIL Template (if applicable). All necessary updates & changes must be submitted to the HUD Privacy Office by June 30th.

PLOs should conduct a status check of their office(s) that have not conducted PIA annual reviews & submitted updated/significantly modified PIA(s) for certification.

NLT June 15th

PLOs should send reminders to SO(s) who have not submitted their updated PIA(s) & complete PCIL Template (if applicable).

SO(s) in each office should complete their review & ensure any systems with significant changes and/or have expired PIA(s) are updated, completed & submitted to the

Any new or existing PIAs that were approved after December 1st are not required to submit an annual certification PIA 6 months prior to June 1st.