

Privacy Impact Assessment How-To-Guide

Introduction

The U.S. Department of Housing and Urban Development (HUD) Form 1113 PIA Completion How-To Guide is designed to help HUD Program and Regional Offices understand the HUD Privacy Office requirements, how to complete, and submit a PIA for review and approval.

In accordance with Section 208 of the E-Government Act of 2002, PIAs are required by all federal government agencies that develop or procure new information technology involving the collection, maintenance, or dissemination of information in identifiable form or that make substantial changes to existing information technology that manages information in identifiable form. According to the Act, the PIA's purpose is to demonstrate that system owners and developers have incorporated privacy protections throughout the entire life cycle of a system.

Scope:

Program and Regional Offices are required to complete a PIA for each HUD information system, General Support System (GSS), or electronic collection that collects, maintains, uses, and/or disseminates personally identifiable information (PII) about U.S. citizens, Federal employees, and Federal 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.

Program and Regional Offices, represented by their designated Privacy Liaison Officer (PLO), are responsible for completing the PIA in its entirety, ensuring the information is accurate and complete, and stakeholders (System Owner, Information System Security Officer (ISSO), Records Management Liaison Officer (RMLO), PLO, HUD Records Officer, and Paperwork Reduction Act Liaison Officer) review and sign the PIA prior to submitting to the HUD Privacy Office for review and approval.

When completing PIA(s) on **Shared Drive and SharePoint** use the following Cyber Security Asset Management (CSAM) ID and System Code. **Shared Drive:** CSAM ID 987, P207 Mainframe (IBM); CSAM ID 959, P209 LAN File Server; CSAM ID 962, P212 Mainframe; CSAM ID 1098, X01 Windows Azure Public Cloud. **SharePoint:** CSAM ID 1095, D110 MS O365. Ensure the Shared Drive and SharePoint Administrators sign the PIA.

If a new or modified System of Records Notice (SORN) is applicable to the HUD information system or electronic collection, complete the PIA after the SORN has been published in the Federal Register.

Use **plain language**, the current **PIA template**, and be detailed when completing the PIA. Submit PIA(s) to the HUD Privacy Office at privacy@hud.gov.

HUD Privacy Office PIA review schedule is First In/First Out, with a 2-week review period.

HUD Chief Privacy Officer (CPO) PIA review schedule is First In/First Out, Potential Loss of Life, and/or Secretary of HUD has mandated in writing that the information system is a priority. If either of those reasons are not relevant to the PIA review process, the PIAs will be reviewed in a timely manner based on when it has been submitted to the HUD Privacy Office.

For additional questions, contact the HUD Privacy Office at privacy@hud.gov.

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Complete the following PIA sections:

1. HUD INFORMATION SYSTEM:	Add name of the information system, GSS, or electronic collection
2. HUD DIVISION NAME:	Add HUD Division which PIA applies
3. CSAM ID:	Add HUD CSAM

Section 1: Description Summary (For Public Release)

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

<input type="checkbox"/> General public (including Federal Contractors)	<input type="checkbox"/> No PII (Fill out 1c & 1d, then go to Section 4)
<input type="checkbox"/> Federal employees	<input type="checkbox"/> Other (if selected, enter information below)
<input type="checkbox"/> Third-Party vendors	

Select all applicable. If "Other" is selected, use this text field to identify other means of collecting PII.

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

<input type="checkbox"/> New HUD Information System	<input type="checkbox"/> New collection
<input type="checkbox"/> Existing HUD Information System	<input type="checkbox"/> Existing collection
<input type="checkbox"/> Significantly modified HUD Information System (if selected, please describe the modification in the box below)	

Select all applicable. If "significantly modified HUD Information System" is selected:

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)

Provide a thorough and clear overview to ensure the reader understands the purpose of the information system or collection. The purpose must be consistent with the mission/purpose identified in CSAM and/or applicable SORN. Use this text field to also include a list of types of PII collected. Types of PII collected must match section 2a of PIA.

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

<input type="checkbox"/> Verification	<input type="checkbox"/> Data Matching	<input type="checkbox"/> Business Analytics and Metrics
<input type="checkbox"/> Identification	<input type="checkbox"/> Mission-Related Use	
<input type="checkbox"/> Authentication	<input type="checkbox"/> Administrative Use	

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When describing the purpose for section 1c., it must contain elements of the following:

- The purpose of the program, IT system, or technology and how it relates to the program office and agency mission
- A general description of the information in the IT system and description of a typical transaction conducted on the IT system
- A general description of the modules and subsystems, where relevant, and their functions

When selecting for section 1d., select all applicable for PII being collected, maintained, used, or disseminated for the system.

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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.

Select if individuals can object to providing their PII. If “Yes,” state “The PII collection is voluntary” and describe in the text field. If “No,” state “Individuals don’t have the right to consent” and describe in the text field.

Individuals should have the right to object unless the information collection is required by law. For example, even though PII is mandatory for completing job or loan applications, individuals can refuse to provide their PII, thereby withdrawing from the loan process.

f. 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.

Select if individuals can consent to the specific uses, or if the consent is given to cover all uses of their PII. If “Yes” state “The PII collection is voluntary.” and describe the method in text field. If “No”, state “Individuals do not have the right to consent,” and describe the reason why in this text field.

If the response to section 1e. is “Yes,” the response to section 1f. must also be “Yes.”

g. When an individual is asked to provide PII, is a Privacy Act Statement, Privacy Notice and/or a Privacy Advisory provided? *(Please provide the “actual wording” in the box below and check as appropriate)*

Privacy Act Statement Privacy Notice Privacy Advisory Not Applicable

Select and provide the exact wording. A PIA without exact wording of a PAS, Privacy Notice, or Privacy Advisory will not be approved.

If you select “**Privacy Act Statement (PAS)**” ensure it includes the following format:

- A PAS is derived from the applicable SORN.
 - **Authority:** Taken from the SORN in the category “Authority for Maintenance of the System”
 - **Purpose:** Taken from the SORN “Purpose of the System”
 - **Routine Use(s):** Taken from the SORN “Routine Uses of Records Maintained in the System, Including Categories of Users and Purposes of Such Uses” on whom you share/disclose the information with outside of HUD. Provide a link to the SORN if RUs are a lot.
 - **Disclosure:** Mandatory or Voluntary. If voluntary, provide the effects on the individuals if the information is not provided.
 - **System of Records Notice:** Title/Number and URL link to SORN

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Example of formatting for a PAS on the PIA:

g. When an individual is asked to provide PII, is a Privacy Act Statement, Privacy Notice and/or a Privacy Advisory provided? *(Please provide the "actual wording" in the box below and check as appropriate)*

Privacy Act Statement
 Privacy Notice
 Privacy Advisory
 Not Applicable

Authority:
 Purpose:
 Routine Use:
 Disclosure:
 SORN Name/Number (if applicable)

h. Source(s) of the PII collected is / are: *(Check all that apply and list all information systems this system receives PII from)*

Individuals
 Databases
 Existing HUD information systems
 Public Source (from internet, news feeds, court records)
 Other Federal information systems
 Other (if selected, enter information below)

Select all applicable. Use this text field to list internal or external systems that are providing the PII. For existing HUD systems include the system code and title. If "Other" is selected, describe in this text field.

i. How will the PII information be collected? *(Check all applicable choices and list any Official Form numbers and titles)*

Encrypted Email
 Telephone interview
 Face-to-face contact
 Website/e-form
 Fax
 Paper
 Information sharing/system-to system
 Other (if selected, enter information below)
 Official form

Select all applicable. Use this field to list official form numbers and their titles. If "Other" is selected, use this field to identify other means of collecting PII.

j. With whom will the PII be shared through electronic data interchange, both within your HUD Division and outside your HUD Division? *(Check all that apply and list all Office/Division/Agency names)*

Within the HUD Office/Division
 Add Offices/Divisions within your Office
 Other HUD Office(s)/Division(s)
 Add other Offices and Divisions within HUD
 Other federal agencies
 Add Federal Agencies you share PII with
 State & local agencies
 Add State/Local Agencies you share PII
 CONTRACTORS (Add contractor name & use the "other" box to describe how the contract describes safeguarding PII)
 Add if sharing with Contract Company
 Other (if selected, enter information)
 Use to describe how contractor safeguard PII, or list "others" you share PII with
 None

Select all that apply. This section is only used to identify electronically shared PII (one-way system to system). **DO NOT** add Offices/Divisions or Agencies you share PII with manually, for example, email or hard copy forms. Only identify contract companies you electronically share PII with. **DO NOT** add contractors who provide contract support.

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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 retrieved by name of another unique identifier. PIA and Privacy Act SORN information must be consistent.

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.

Select "Yes," if the system collects PII and your Office's business practice is to retrieve by using PII or another unique identifier. Use this text field to identify SORN by listing System Identifier and URL (web address) to the published SORN. If you select "No," use this text field to explain why the SORN is not required and how information is retrieved from 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: Provide NARA Job Number

(2) If pending, provide the date the SF-115 was submitted to NARA:

(3) Retention instructions:

Add all applicable GRS Authorities in this text field. Also list all applicable records retentions in this text field.

Section 1k., if applicable, SORN information can be found at <https://www.federalregister.gov/>

Contact the program office designated Records Management Liaison Officer for assistance.

If you select "Yes," for section 1k., provided the SORN System Identifier information, the legal authorities listed must match the SORN.

SORN information can be found at <https://www.federalregister.gov/>

Section 1l., contact the program office designated Records Management Liaison Officer for assistance.

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 statute or Executive Order.

List the legal authorities to collect and maintain PII in the system. Authorities include statutes, executive orders, OMB memoranda, and program HUD handbook. A general citation to an act, i.e., "The National Housing Act," is insufficient. The citation must point to the specific sections of the statute or other authorities which are pertinent to the system's function.

Contact the program office servicing legal counsel for assistance to identify and/or verify the applicable legal authorities.

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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.

Select applicable. Identify if the information system or electronic collection has an active and approved OMB Control Number. If PII is collected using forms on 10 or more members of the public, there must be an applicable OMB Control Number.

If “Yes,” use the text field to list all applicable OMB Control Number(s). If “No,” use the text field to explain why OMB approval is not required. If “Pending,” provide the 60 and/or 30-day notice date, with the Federal Register citation

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Section 2: PII Risk Review

a. What PII will be collected or maintained on the information system or project: (Check all that apply)

- | | | |
|---|---|---|
| <input checked="" type="checkbox"/> Age | <input type="checkbox"/> Employment Status, History, or Information (e.g., title, position) | <input type="checkbox"/> Phone Number(s) |
| <input type="checkbox"/> Alias | <input type="checkbox"/> Fax Number | <input type="checkbox"/> Photographic Identifiers (e.g. photograph, video, x-ray) |
| <input type="checkbox"/> Audio Recordings | <input type="checkbox"/> Financial Information (e.g., credit report, account number) | <input type="checkbox"/> Place of Birth |
| <input type="checkbox"/> Biometrical Identifiers (e.g., fingerprint(s), iris image) | <input type="checkbox"/> Foreign activities | <input type="checkbox"/> Protected Health Information |
| <input type="checkbox"/> Certificates (e.g., birth, death, marriage) | <input checked="" type="checkbox"/> Full Name | <input type="checkbox"/> Race / Ethnicity |
| <input type="checkbox"/> Citizenship(s) | <input type="checkbox"/> Gender | <input type="checkbox"/> Religion |
| <input type="checkbox"/> Credit Card Number | <input type="checkbox"/> Geolocation Information | <input type="checkbox"/> Salary |
| <input checked="" type="checkbox"/> Criminal records information | <input checked="" type="checkbox"/> Home Address | <input checked="" type="checkbox"/> Sex |
| <input type="checkbox"/> Date of Birth | <input checked="" type="checkbox"/> Internet Cookie Containing PII | <input type="checkbox"/> Social Security Number (SSN) (Full or in any form) |
| <input checked="" type="checkbox"/> Device identifiers (e.g., mobile devices) | <input type="checkbox"/> Investigation Report or Database IP/MAC Address | <input type="checkbox"/> Taxpayer ID |
| <input type="checkbox"/> Drivers' License / State ID Number | <input type="checkbox"/> Legal Documents, Records | <input checked="" type="checkbox"/> User ID |
| <input checked="" type="checkbox"/> Education Records | <input type="checkbox"/> Marital Status | <input type="checkbox"/> Vehicle Identifiers (e.g., license plate) |
| <input type="checkbox"/> Email Address(es) | <input type="checkbox"/> Military status or other information | <input type="checkbox"/> Web uniform resource locator(s) |
| <input type="checkbox"/> Employee Identification Number | <input checked="" type="checkbox"/> Mother's Maiden Name | <input type="checkbox"/> Work Address |
| | <input type="checkbox"/> Passport Information | <input type="checkbox"/> Other (if selected, enter information below) |

Select all that apply. If you select “Other,” use the text field to list additional PII collected and maintained in the system, project, or electronic collection.

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- b. If the SSN is collected, please list the proper HUD authority to do so. (Reference the Privacy Handbook on Social Security Number Policy)**

If the SSN is collected, use this text field to list the authority, policy, memo, and/or directive that permits the collection of SSNs for the system. Also, state why the use of SSN is necessary as opposed to other identifiers.

- c. PII Confidentiality Impact Level (PCIL) - Low Moderate High**

Select the appropriate PCIL and ensure to update/annotate CSAM section "Agency Defined Data Items" with the PCIL. The PCIL template must be sent along with the PIA to the HUD Privacy Office for review.

Select applicable PCIL rating based on determination made on the PCIL Template. **PCIL must be submitted with PIAs collecting PII. Click for [PCIL Template](#).**

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Section 3: PII Security Measures

a. How will the PII be secured? *(Include any physical, administrative, technical controls, and other controls place)*

(1) Physical Controls. *(Check all that apply)*

- | | |
|--|---|
| <input type="checkbox"/> Cipher locks | <input type="checkbox"/> Closed Circuit TV |
| <input type="checkbox"/> Combination locks | <input type="checkbox"/> Identification badges |
| <input type="checkbox"/> Key cards | <input type="checkbox"/> Safes |
| <input type="checkbox"/> Security Guards | <input type="checkbox"/> Other (if selected, enter information below) |

Select applicable. Use this text field to identify and specify how the PII is secured using Physical Controls

(2) Administrative Controls. *(Check all that apply)*

- | | |
|--|--|
| <input type="checkbox"/> Backups Off-Site | <input type="checkbox"/> Periodic Security Audit |
| <input type="checkbox"/> Encryption of Backups | <input type="checkbox"/> Regular Monitoring of Users' Security Practices |
| <input type="checkbox"/> Methods to Ensure Only Authorized Personnel Access to PII | <input type="checkbox"/> Other (if selected, enter information below) |

Select applicable. Use this text field to identify and specify how the PII is secured using Administrative Controls.

(3) Technical Controls. *(Check all that apply)*

- | | |
|--|---|
| <input type="checkbox"/> Biometrics | <input type="checkbox"/> Public Key Infrastructure Certificates |
| <input type="checkbox"/> Encryption of Data at Rest | <input type="checkbox"/> External Certificate Authority Certificates |
| <input type="checkbox"/> Firewall | <input type="checkbox"/> Least Privilege Access |
| <input type="checkbox"/> Role-Based Access Controls | <input type="checkbox"/> User Identification and Password |
| <input type="checkbox"/> Virtual Private Network (VPN) | <input type="checkbox"/> PIV Card |
| <input type="checkbox"/> Encryption of Data in Transit | <input type="checkbox"/> Intrusion Detection System (IDS) |
| <input type="checkbox"/> Used Only for Privileged (Elevated Roles) | <input type="checkbox"/> Other (if selected, enter information below) |

Select applicable. Use this text field to identify and specify how the PII is secured using Technical Controls.

b. What additional measures / safeguards have been put in place to address privacy risks for this information system or electronic collection? *(Input N/A if not applicable)*

If applicable, use this text field to identify any additional measures or safeguards for securing PII.

c. Where is PII stored within the system? *(Check all that apply)*

- | | |
|--|---|
| <input type="checkbox"/> On a centralized HUD server | <input type="checkbox"/> On hard copy documents |
| <input type="checkbox"/> On individual HUD laptops | <input type="checkbox"/> Other (if selected, enter information below) |
| <input type="checkbox"/> In e-mails | |

Please specify selection(s) made.

Select applicable. Use the text field to identify how the information is stored and specify selection made in text field

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d. Indicate the assessment and authorization status:

- | | |
|--|---------------------|
| <input type="checkbox"/> Authorization to Operate (ATO) | Date Granted: _____ |
| <input type="checkbox"/> ATO with Conditions | Date Granted: _____ |
| <input type="checkbox"/> Denial of Authorization to Operate (DATO) Interim | Date Granted: _____ |
| <input type="checkbox"/> Authorization to Test (ATT) | Date Granted: _____ |
| <input type="checkbox"/> To Be Determined (TBD) | |

Select applicable. ATO assessment and status information can be found in CSAM.

System Owner:

Name: _____

Signature: _____

SharePoint Admin* or Shared Drive Admin:** (if applicable)

Name: _____

Signature: _____

Information System Security Officer:

Name: _____

Signature: _____

Records Management Liaison Officer:

Name: _____

Signature: _____

Privacy Liaison Officer:

Name: _____

Signature: _____

HUD Records Officer:

Name: _____

Signature: _____

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Section 4: Review and Approval Signatures Continued

Paperwork Reduction Act Liaison Officer:

Name:

Signature: 

Once all required signatures are collected on this page, please send PIA and PCIL to the HUD Privacy Office via the privacy submission button below.

HUD Privacy Office will route the PIA to Chief Privacy Office and Senior Agency Official for Privacy for signatures.

Prior to submitting PIA to HUD Privacy for review, the program office PLO will assist with routing for signatures identified in the below screenshots.

#	Required Signatures	Actions
1	System Owner	Signature to be completed by the information system's Owner.
2	*Shared Drive Administrator or **SharePoint Administrator <i>(if applicable)</i>	Signature to be completed by Shared Drive Administrator and SharePoint Administrator only if PIA is regarding PII collected and stored in Shared Drive and SharePoint.
3	Information System Security Officer	Signature to be completed by ISSO.
4	Records Management Liaison Officer	Signature to be completed by the RMLO.
5	Privacy Liaison Officer	Signature to be completed by the PLO.
6	HUD Records Officer	Signature to be completed by the HUD Records Officer.
7	Paperwork Reduction Act Liaison Officer	Signature to be completed by the PRA Officer.
8	HUD Chief Privacy Officer	The HUD Privacy Office will route PIA to the CPO for review and approval when PIA is accurate and complete.
9	Senior Agency Official for Privacy	The HUD Privacy Office will route the PIA to the SAOP when approved by CPO for review and approval.

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HUD Privacy Office will route the PIA to Chief Privacy Office and Senior Agency Official for Privacy for signatures.

HUD Chief Privacy Officer:

Name:

Signature:

Senior Agency Official for Privacy:

Name:

Signature:

PIA NUMBER:

PIA APPROVAL DATE:

Once completed, click the below blue button to email the complete copy to the Privacy inbox (privacy@hud.gov).

Note that only Section 1 of this PIA will be published to HUD's public website.

Submit to Privacy Inbox

Please check the boxes below that are relevant to your PIA process and Annual Certification.

- This is a new PIA
- This is a revision for an existing PIA
- This is an annual certification for an existing PIA with no changes
- This is an annual certification for an existing PIA with significant changes
- This is a Notification of Rescindment for an existing PIA

Select applicable reason the PIA is being submitted.

After HUD Privacy PIA SME determine the PIA to be accurate and complete, they will route it to the CPO and SAOP for review and approval.

When complete, hit the “Submit to Privacy Inbox” button or email to privacy@hud.gov.

Submit to Privacy Inbox