



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

MEMORANDUM FOR: Distribution

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FROM: LaDonne White, Chief Privacy Officer, AHFC

SUBJECT: Privacy Office Memorandum 04-00, Senior Agency Official for Privacy (SAOP) and Privacy Office Authority and Responsibilities

This memorandum clarifies the authority and responsibilities of the U.S. Department of Housing and Urban Development (HUD) Senior Agency Official for Privacy (SAOP) and Privacy Office. In order to manage information systems in a way that addresses and mitigates risks, it is important to identify the key roles, including responsibilities delegated to the SAOP, Chief Privacy Officer (CPO) and Privacy Liaison Officers (PLOs).

HUD Senior Agency Official for Privacy Authority and Responsibility

Per OMB Memorandum 16-24, the SAOP has agency-wide responsibility and accountability for developing, implementing, and maintaining an agency-wide privacy program to ensure compliance with all applicable statutes, regulations, and policies regarding the creation, collection, use, processing, storage, maintenance, dissemination, disclosure, and disposal of PII by programs and information systems, developing and evaluating privacy policy, and managing privacy risks at the agency. The SAOP is responsible for:

- Serving as HUD's senior policy authority on matters relating to the public disclosure of information, advising on privacy issues related to informed consent, disclosure risks, and data sharing;
- Developing and overseeing implementation of Agency-wide policies and procedures relating to the Privacy Act, and assuring that personal information contained in Privacy Act systems of records is handled in compliance with its provisions;
- Complying with Privacy Act requirements for publishing, revising, and rescinding System of Record Notices (SORNs) as needed;
- Communicating HUD's privacy vision, principles, and policies internally and externally working with the Privacy Liaison Officers (PLO's) in each business area as appropriate;
- Advocating strategies for data and information collection and dissemination, and conducting an annual PII inventory to ensure HUD's privacy policies and principles are reflected in all operations;
- Managing privacy risks associated with HUD activities that involve the creation, collection, use, processing, storage, maintenance, dissemination, disclosure, and disposal of PII by programs and information systems;
- Ensuring that HUD employees have the appropriate training and education concerning privacy laws, regulations, policies, and procedures;

- Working with HUD stakeholders to ensure the vendors with access to PII that engage in business with HUD abide by federal privacy requirements;
- Overseeing HUD's process for reviewing and approving Privacy Impact Assessments (PIA) to ensure compliance with the E-Government Act;
- Coordinating with HUD's Chief Technology Officer (CTO) and Chief Information Security Officer (CISO) to ensure that the FISMA authorization and accreditation (A&A) process for new and existing systems appropriately addresses privacy-related risks;
- Partnering with the CTO and CISO to ensure all aspects of HUD's privacy program are incorporated into HUD's enterprise infrastructure, information technology (IT), and IT security program;
- Ensuring HUD is compliant and up to date with federal reporting and publication requirements and deadlines.

HUD Privacy Office Authority and Responsibility

In accordance with OMB Memorandum 16-24, HUD's SAOP has delegated the daily operations of HUD's privacy program to HUD's Program Office, under supervision of the Chief Privacy Officer (CPO). The CPO is responsible for substantive components of HUD's Privacy Office, including:

- Overseeing privacy team staff, including analysts and specialists;
- Developing and overseeing implementation of HUD-wide policies and procedures relating to the Privacy Act, and assuring that personal information in Privacy Act systems of records is handled in compliance with its provisions;
- Complying with Privacy Act requirements for publishing, revising, and rescinding System of Record Notices (SORNs) as needed;
- Communicating HUD's privacy vision, principles, and policies internally and externally, including working with the Privacy Liaison Officers (PLO's) in each business area as appropriate;
- Ensuring that HUD employees have the appropriate training and education concerning privacy laws, regulations, policies, and procedures;
- Managing day-to-day operations of the Privacy Office;
- Overseeing HUD's process for reviewing and approving PIAs and SORNs;
- Consulting with HUD offices to ensure implementation of and compliance with Privacy policies;
- Working with PLOs to maintain agency-wide compliance with privacy regulations and up to date federal reporting;
- Implementing and overseeing incident response procedures and reporting breaches to the SAOP.

HUD Privacy Liaison Officer Authority and Responsibility

In accordance with OMB Memorandum 16-24, HUD's SAOP has required every office to appoint a PLO who serves as the liaison between their respective Program Office / Regional Office and the HUD Privacy Office. The PLOs responsibilities include:

- Overseeing compliance with privacy regulations in their respective office, including understanding PIAs, SORNs, CMAs, breach notification guidelines, and other requirements for handling PII;
- Tracking and reporting Privacy violations to the Privacy Office;
- Serving as the point of contact for privacy questions and incidents;
- Attending monthly PLO meetings;
- Attending required role-based trainings.

CANCELLATIONS

This Memorandum does not replace, rescind, or modify any other Privacy Office Directive or Memorandum.

FOR DISTRIBUTION: HUD PLOs