

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

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**Community Planning and Development  
System Development and Evaluation  
Division**

**Integrated Disbursement and Information System  
OnLine  
(IDIS) OnLine**

**Privacy Impact Assessment**

**November 1<sup>st</sup>, 2010**

## DOCUMENT ENDORSEMENT

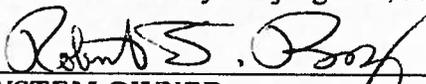
I have carefully assessed the Privacy Impact Assessment (PIA) for **Integrated Disbursement and Information System OnLine**. This document has been completed in accordance with the requirement set forth by the E-Government Act of 2002 and OMB Memorandum 03-22 which requires that "Privacy Impact Assessments"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

### ENDORSEMENT SECTION

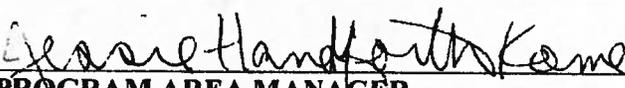
Please check the appropriate statement.

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

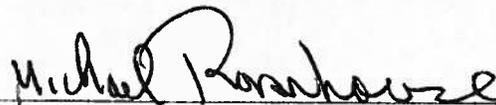
Based on our authority and judgment, the data captured in this document is current and accurate.

  
\_\_\_\_\_  
**SYSTEM OWNER**  
[SYSTEM DEVELOPMENT AND EVALUATION DEVISION]

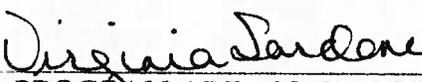
1/26/2011  
Date

  
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**PROGRAM AREA MANAGER**  
[COMMUNITY DEVELOPMENT BLOCK GRANTS]

02/05/2011  
Date

  
\_\_\_\_\_  
**PROGRAM AREA MANAGER**  
[EMERGENCY SHELTER GRANTS]

2/7/11  
Date

  
\_\_\_\_\_  
**PROGRAM AREA MANAGER**  
[HOME INVESTMENT PARTNERSHIPS]

2/3/11  
Date

  
\_\_\_\_\_  
**PROGRAM AREA MANAGER**  
[HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS]

1/21/11  
Date

  
\_\_\_\_\_  
**DEPARTMENTAL PRIVACY ACT OFFICER**  
Office of the Chief Information Officer  
U. S. Department of Housing and Urban Development

2/13/11  
Date

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**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
PRIVACY IMPACT ASSESSMENT (PIA) FOR:**

**INTEGRATED DISBURSEMENT AND INFORMATION SYSTEM (IDIS)**

**(for IT Systems: [#: 025-00-04-00-01-1010-00-207-087]  
and [Insert PCAS #00252200] )**

**November 1st 2010**

NOTE: See Section 2 for PIA answers, and Section 3 for Privacy Act Officer's determination.

**SECTION 1: BACKGROUND**

**Importance of Privacy Protection – Legislative Mandates:**

HUD is responsible for ensuring the privacy and confidentiality of the information it collects on members of the public, beneficiaries of HUD programs, business partners, and its own employees. These people have a right to expect that HUD will collect, maintain, use, and disseminate identifiable personal information only as authorized by law and as necessary to carry out agency responsibilities.

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

- Privacy Act of 1974, as amended affords individuals the right to privacy in records that are maintained and used by Federal agencies. (See <http://www.usdoj.gov/foia/privstat.htm>; see also HUD Handbook 1325.1 at [www.hudclips.org](http://www.hudclips.org));
- Computer Matching and Privacy Protection Act of 1988 is an amendment to the Privacy Act that specifies the conditions under which private information may (or may not) be shared among government agencies. (See <http://www.usdoj.gov/foia/privstat.htm>);
- Freedom of Information Act of 1966, as amended ([http://www.usdoj.gov/oip/foia\\_updates/Vol\\_XVII\\_4/page2.htm](http://www.usdoj.gov/oip/foia_updates/Vol_XVII_4/page2.htm)) provides for the disclosure of information maintained by Federal agencies to the public, while allowing limited protections for privacy. See also HUD's Freedom of Information Act Handbook (HUD Handbook 1327.1 at [www.hudclips.org](http://www.hudclips.org));
- E-Government Act of 2002 requires Federal agencies to conduct Privacy Impact Assessments (PIAs) on its electronic systems. (See [http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107\\_cong\\_public\\_laws&docid=f:publ347.107.pdf](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=107_cong_public_laws&docid=f:publ347.107.pdf); see also the summary of the E-Government Act at [http://www.whitehouse.gov/omb/egov/pres\\_state2.htm](http://www.whitehouse.gov/omb/egov/pres_state2.htm));
- Federal Information Security Management Act of 2002 (which superceded the Computer Security Act of 1987) provides a comprehensive framework for ensuring the effectiveness of information security controls over information resources that support Federal operations and assets, etc. See also the codified version of Information Security

regulations at Title 44 U.S. Code chapter 35 subchapter II (<http://uscode.house.gov/search/criteria.php>); and

- OMB Circular A-130, Management of Federal Information Resources, Appendix I ([http://www.whitehouse.gov/omb/circulars/a130/appendix\\_i.pdf](http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf)) defines Federal Agency responsibilities for maintaining records about individuals.

Access to personally identifiable information will be restricted to those staff that has a need to access the data to carry out their duties; and they will be held accountable for ensuring privacy and confidentiality of the data.

### **What is the Privacy Impact Assessment (PIA) Process?**

The Privacy Impact Assessment (PIA) is a process that evaluates issues related to the privacy of personally identifiable information in electronic systems. See background on PIAs and the 7 questions that need to be answered, at: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

Personally identifiable information is defined as information that actually identifies an individual, e.g., name, address, social security number (SSN), or identifying number or code; or other personal/ sensitive information such as race, marital status, financial information, home telephone number, personal e-mail address, etc. Of particular concern is the combination of multiple identifying elements. For example, knowing name + SSN + birth date + financial information would pose more risk to privacy than just name + SSN alone.

The PIA:

- Identifies the type of personally identifiable information in the system (including any ability to combine multiple identifying elements on an individual);
- Identifies who has access to that information (whether full access or limited access rights); and
- Describes the administrative controls that ensure that only information that is necessary and relevant to HUD's mission is included.

### **Who Completes the PIA?**

Both the program area System Owner and IT Project Leader work together to complete the PIA. The System Owner describes what personal data types are collected, how the data is used, and who has access to the personal data. The IT Project Leader describes whether technical implementation of the System Owner's requirements presents any risks to privacy, and what controls are in place to restrict access of personally identifiable information.

### **When is a Privacy Impact Assessment (PIA) Required?**

1. **New Systems:** Any new system that will contain personal information on members of the public requires a PIA, per OMB requirements (this covers both major and non-major systems).

**2. Existing Systems:** Where there are significant modifications involving personal information on members of the public, or where significant changes been made to the system that may create a new privacy risk, a PIA is required.

**3. Information Collection Requests, per the Paperwork Reduction Act (PRA):** Agencies must obtain OMB approval for new information collections from ten or more members of the public. If the information collection is both a new collection and automated, then a PIA is required.

### **What are the Privacy Act Requirements?**

**Privacy Act.** The Privacy Act of 1974, as amended (<http://www.usdoj.gov/foia/privstat.htm>) requires that agencies publish a Federal Register Notice for public comment on any intended information collection. Privacy Act Systems of Records are created when information pertaining to an individual is collected and maintained by the Department, and is retrieved by the name of the individual or by some other identifying number, symbol, or other identifying particular assigned to an individual. The E-Government Act of 2002 requires PIAs for electronic systems as well as information collection requests that are automated. So, there is a relationship between the new PIA requirement (when automation is involved) and the long-standing Privacy Act System of Records Notices (for both paper-based and automated records that are of a private nature). For additional information, contact the Departmental Privacy Act Officer in the Office of the Chief Information Officer.

### **Why is the PIA Summary Made Publicly Available?**

The E-Government Act of 2002 requires that the analysis and determinations resulting from the PIA be made publicly available. The Privacy Advocate in HUD's Office of the Chief Information Officer (OCIO) is responsible for publishing the PIA summary on HUD's web site. See: <http://www.hud.gov/offices/cio/privacy/pia/pia.cfm>.

**SECTION 2 – COMPLETING A PRIVACY IMPACT ASSESSMENT**

Please submit answers to the Departmental Privacy Act Officer in the Office of the Chief Information Officer (OCIO). If any question does not apply, state Not Applicable (N/A) for that question, and briefly explain why it is not applicable.

**Program Area: Community Planning and Development**  
**Subject matter expert in the program area: Robert Brever**  
**Program Area Manager: Robert Brever**  
**IT Project Leader: Hung T. Pham**

**For IT Systems:**

- **Name of system: Integrated Disbursement and Information System (IDIS) OnLine**
- **PCAS #: 00252200**
- **OMB Unique Project Identifier #: 025-00-04-00-01-1010-00-207-087**
- **System Code: C04**
- **Development Date: 01/11/1994 (Identifying information assigned)**
- **Expected Production Date: Operational 5/19/1995**

**For Information Collection Requests:**

	<b>Name of Information Collection Request:</b>	<b>OMB Control #:</b>
<b>CDBG</b>	Community Development Block Grant (CDBG) Entitlement Program, State Community Development Block Grant (CDBG) Program, CDBG Urban County/New York Towns Qualification/Requalification Process Consolidated Plan IDIS OnLine Access Request Form	<b>2506-0077</b> <b>2506-0085</b> <b>2506-0170</b> <b>2506-0117</b> <b>2506-0171</b>
<b>HOME</b>	HOME Investment Partnerships Program Consolidated Plan IDIS OnLine Access Request Form	<b>2506-0171</b> <b>2506-0117</b>
<b>ESG</b>	Consolidated Plan IDIS OnLine Access Request Form	<b>2506-0117</b> <b>2506-0171</b>
<b>HOPWA</b>	Housing Opportunities for Persons with AIDS (HOPWA) Program: Competitive Grant Application; Annual Progress Report (APR) for (Competitive Grantees); Consolidated Annual Performance... (Caper) Consolidated Plan IDIS OnLine Access Request Form	<b>2506-0133</b> <b>2506-0117</b> <b>2506-0171</b>
<b>TCAP</b>	Tax Credit Assistance Program (TCAP) Consolidated Plan. IDIS OnLine Access Request Form	<b>2506-0181</b> <b>2506-0171</b>
<b>CDBG-R</b>	Community development Block Grant Consolidated Plan Recovery (CDBG-R) Program IDIS OnLine Access Request Form	<b>2506-0184</b> <b>2506-0117</b> <b>2506-0171</b>
<b>HPRP</b>	Homelessness Prevention and Rapid Re-Housing Program (HPRP) Quarterly Performance Report and Supplement to First Report Consolidated Plan IDIS OnLine Access Request Form	<b>2506-0186</b> <b>2506-0117</b> <b>2506-0171</b>

**Question 1: Provide a general description of the system that describes:** The following questions are intended to define the scope of the information in the system (or information collection), specifically the nature of the information and the sources from which it is obtained.

- a. **What is the personal information being collected?** (e.g. name, address, gender/sex, race/ethnicity, income/financial data, employment history, medical history, Social Security Number, Tax Identification Number, Employee Identification Number, FHA Case Number)

IDIS OnLine collects the names of local projects and activities funded by grants, the amount of funds used for projects and activities, the amount and type of funds spent, the nature of the activity on which the money is spent, and accomplishments resulting from the expenditure of funds. Grantees enter this information into IDIS OnLine. For the CDBG, ESG, and HOPWA programs, aggregated information on the nature of all beneficiaries for an activity are entered into IDIS OnLine such as the total number of housing units, total number of jobs, total number of persons, total number of households benefiting from the activity, and the income and racial characteristics of the group of beneficiaries for those activities. The HOME program however asks its grantees to also report by address, the name of the owner for homeowner activity. While the name is not required, the racial and income characteristics are required. For rental housing activities, we ask but do not require the submission of the owner's name of the building and address. We don't ask for income or racial characteristics of the owner.

- b. **From whom is the information collected (i.e., government employees, contractors, or consultants)?** The grantees enter this information into IDIS OnLine
- c. **What is the functionality of the system and the purpose that the records and/or system serve?**

IDIS OnLine is an existing grants management system used currently by grantees of seven formula grant programs managed by CPD. The first four are Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG), and Housing Opportunities for Persons with AIDS formula (HOPWA) programs. IDIS OnLine also supports three special grant programs established by the 2009 American Recovery and Reinvestment Act (ARRA) including Tax Credit Assistance Program (TCAP), Community Development Block Grant-Recovery (CDBG-R), and Homelessness Prevention & Rapid Re-housing Program (HPRP). All of these grants programs have "back end" review requirements. Collecting the information is necessary to determine if each program's money was spent on eligible activities as well as verify that grantees are complying with all the statutory and regulatory provisions for the use of the grants funds.

- d. **How information is transmitted to and from the system;**

IDIS OnLine is accessible via the internet at  
<http://www.hud.gov/offices/cpd/systems/idis/idis.cfm>

Click on a link to get to the IDIS OnLine login page. Most grantees save information directly from the web screens; however about 25 of the 1200+ grantees prefer to transmit data to IDIS OnLine using HUD'S Electronic Data Interchange to upload large amounts of data electronically into IDIS OnLine. Grantee internet access utilizes SSL technology with 128 bit encryption.

**e What are the interconnections with other systems.**

IDIS OnLine interfaces with LOCCS to allow grantee users to draw program funds. IDIS OnLine also has an Electronic Data Interchange (EDI) function that many larger grantees use to batch-upload activity and accomplishment data and minimize data entry. Now that IDIS OnLine has been modernized to EA-compliant technology, IDIS OnLine is interconnected with CPD's Grant Management Process (GMP) and there are future plans to link IDIS OnLine with other eGrants systems such as Disaster Recovery Grant Reporting (DRGR).

**f. What specific legal authorities, arrangement, and/or agreement authorize the collection of information (i.e. must include authorities that cover all information collection activities, including Social Security Numbers)?**

**CDBG:** The Housing and Community Development (HCD) Act of 1974 authorizes the Secretary to require recipients of assistance under this chapter to submit to him such reports and other information as may be necessary. Section 104(e) of the Housing and Community Development Act of 1974 gives HUD the authority to collect this information from grantees.

**CDBG-R:** The Housing and Community Development (HCD) Act of 1974 authorizes the Secretary to require recipients of assistance under this chapter to submit to him such reports and other information as may be necessary. Section 104(e) of the Housing and Community Development Act of 1974 gives HUD the authority to collect this information from grantees.

**ESG:** Grantee reporting in IDIS are derived from 24 CFR parts 85 and 91. HUD is authorized to establish regulations to administer the ESG grant program under section 416 of the McKinney-Vento Homeless Assistance Act. The ESG regulations at 24 CFR 576.57(b) incorporate the administrative requirements under 24 CFR part 85. Under 24 CFR 85.40(b), grantees must submit reports on their performance, and under 24 CFR 85.41, grantees must submit financial reports under. Additionally, as specified under 24 CFR 91.2(a), ESG grantees are subject to the consolidated planning requirements under 24 CFR part 91. Under 24 CFR 91.520, grantees must annually report on their performance in a form prescribed by HUD.

**HPRP:** American Recovery and Reinvestment Act of 2009 and the Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-housing Program Grantees under the American Recovery and Reinvestment Act of 2009 (HPRP Notice).

TCAP: American Recovery and Reinvestment Act of 2009

HOME: Statute: HOME Investment Partnerships Act-Title II Cranston Gonzalez National Affordable Housing Act PL 101-625; Home Regulations= 24CFR Part 92; PRA OMB Control 2506-0171

HOPWA: Statute: AIDS Housing Opportunity Act, Public Law 101-625, title VIII, §12911, Report: "Any organization or agency that receives a grant under this chapter shall submit to the Secretary, for any fiscal year in which the organization or agency receives a grant under this chapter, a report describing the use of the amounts received, which shall include the number of individuals assisted, the types of assistance provided, and any other information that the Secretary determines to be appropriate.", and implementing regulations at §574.520.

**Question 2: Type of electronic system or information collection.**

	Yes	No
<b>A. If a new electronic system (or one in development) (implemented after April 2003, the effective date of the E-Government Act of 2002)?</b>		X
Does the system require authentication?	x	<input type="checkbox"/>
Is the system browser-based?	x	<input type="checkbox"/>
Is the system external-facing (with external users that require authentication)?	x	<input type="checkbox"/>

	Yes	No
<b>B. If this is existing electronic system has the system undergone any changes (since April 17, 2003)? If an existing system, when was the system developed? 1996</b>	X	
Do the changes to the system involve a change in the type of records maintained, the individuals on whom records are maintained, or the use or dissemination of information from the system?	X	
If yes, please explain: We have added the American Recovery and Reinvestment (ARRA) grants and collected more information about the activities that grantees fund. The system was re-engineered to use JAVA/Oracle, the department's enterprise solution for web applications.		

**C. For your new and/or existing electronic system, please indicate if any of the following changes have occurred: Mark any of the following conditions for your existing system that OMB defines as a "trigger" for requiring a PIA or PIA update (if not applicable, mark N/A):**

N/A	<b>Conversion:</b> When paper-based records that contain personal information are converted to an electronic system
x	<b>From Anonymous (Non-Identifiable) to “Non-Anonymous” (Personally Identifiable):</b> When any systems application transforms an existing database or data collection so that previously anonymous data becomes personally identifiable
N/A	<b>Significant System Management Changes:</b> When new uses of an existing electronic system significantly change how personal information is managed in the system. (Example #1: when new “relational” databases could combine multiple identifying data elements to more easily identify an individual. Example #2: when a web portal extracts data elements from separate databases, and thereby creates a more open environment for exposure of personal data)
N/A	<b>Merging Databases:</b> When government databases are merged, centralized, matched, or otherwise significantly manipulated so that personal information becomes more accessible (with special concern for the ability to combine multiple identifying elements)
N/A	<b>New Public Access:</b> When <u>new</u> public access is given to members of the public or to business partners (even if the system is protected by password, digital certificate, or other user-authentication technology)
N/A	<b>Commercial Sources:</b> When agencies systematically incorporate into databases any personal data from commercial or public sources (ad hoc queries of such sources using existing technology does not trigger the need for a PIA)
N/A	<b>New Inter-agency Uses:</b> When agencies work together (such as the federal E-Gov initiatives), the lead agency should prepare the PIA
N/A	<b>Business Process Re-engineering:</b> When altering a business process results in significant new uses, disclosures, or additions of personal data
x	<b>Alteration in Character of Data:</b> When adding new personal data raises the risks to personal privacy (for example, adding financial information to an existing database that contains name and address)

<b>D. If an Information Collection Request (ICR): Is this a <u>new</u> Request that will collect data that will be in an <u>automated</u> system?</b> Agencies must obtain OMB approval for information collections from 10 or more members of the public. The E-Government Act of 2002 requires a PIA for ICRs only if the collection of information is a <u>new</u> request and the collected data will be in an <u>automated</u> system.	
	Yes, this is a new ICR and the data will be automated
	No, the ICR does not require a PIA because it is not <u>new</u> or <u>automated</u> )
x	Comment: While this is not a new system, we are now aware that names of the owners are potentially being collected for some activities along with the racial and income characteristics of those owners.

**Question 3: Explain by Line of Business why the personally identifiable information being collected? How will it be used?**

Mark any that apply:

**Homeownership:**

	Credit checks (eligibility for loans)
	Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information
	Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD)
	Loan default tracking
	Issuing mortgage and loan insurance
x	Other (specify): For project identification and compliance monitoring purposes. The name of the owner must be provided in order to verify that the address assisted is the actual principle address of the owner.

**Rental Housing Assistance:**

	Eligibility for rental assistance or other HUD program benefits
	Characteristics on those receiving rental assistance (for example, race/ethnicity, # of children, age)
	Property inspections
	Other (specify):
	Comment: for project identification and compliance monitoring purposes

**Grants:**

	Grant application scoring and selection – if any personal information on the grantee is included
	Disbursement of funds to grantees – if any personal information is included
	Other (specify):
	Comment:

**Fair Housing:**

	Housing discrimination complaints and resulting case files
	Other (specify):
	Comment:

**Internal operations:**

	Employee payroll or personnel records
	Payment for employee travel expenses
	Payment for services or products (to contractors) – if any personal information on the payee is included
	Computer security files – with personal information in the database, collected in order to grant user IDs
	Other (specify):
	Comment:

**Other lines of business (specify uses):**


**Question 4: Will you share the information with others? (e.g., another agency for a programmatic purpose, internal HUD application/module or outside the government)?**

HUD does not share IDIS OnLine information with others, although it allows grantees to download their own data, and it does respond to FOIA requests. The system does store some information, such as the location of shelters, which, if released indiscriminately, could pose a potential violation of safety for those living in the shelter. The IDIS OnLine system administrator reviews all FOIA disseminations to guarantee that no violations of personal security are breached.

Mark any that apply:

	Federal agencies?
	State, local, or tribal governments?
	Public Housing Agencies (PHAs) or Section 8 property owners/agents?
	FHA-approved lenders?
	Credit bureaus?
	Local and national organizations?
	Non-profits?
	Faith-based organizations?
	Builders/ developers?
	HUD module/application? (specify the module(s)/application(s) name)
x	Others? (specify): FOIA requests; HUD's OIG
	Comment:

**Question 5: Can individuals "opt-out" by declining to provide personal information or by consenting only to particular use (e.g., allowing their financial information to be used for basic rent eligibility determination, but for not for sharing with other government agencies)?**

	Yes, they can "opt-out" by declining to provide private information or by consenting only to particular use
X	No, they can't "opt-out" – all personal information is required

	Comment:
--	----------

If Yes, please explain the issues and circumstances of being able to opt-out (either for specific data elements or specific uses of the data):

**Question 6: How will the privacy of the information be protected/ secured?  
What are the administrative and technological controls?**

Mark any that apply and give details if requested:

x	System users must log-in with a password (Please specify password type)
	<p>When an employee leaves:</p> <ul style="list-style-type: none"> <li>• How soon is the user ID terminated? (1 day, 1 week, 1 month, unknown)?</li> <li>• How do you know that the former employee no longer has access to your system? (explain your procedures or describe your plan to improve):</li> </ul> <p>Whenever a user departs HUD, the supervisor is required to notify the security staff promptly to remove the User ID and password from the system in order to control unauthorized access. Security officers check all user access authorization on a routine basis in case action was not taken on a departed employee. The IDIS OnLine Security Administrator has the power to shut down a user's access to IDIS OnLine directly, and often does so when immediacy is a concern – in these cases, the IDIS OnLine Security Administrator usually does not notify the Information Security Staff, since the user has already been prevented from accessing the system.</p>
x	<p>Are access rights selectively granted, depending on duties and need-to-know? If Yes, specify the approximate # of authorized users who have either:</p> <ul style="list-style-type: none"> <li>• Full access rights to all data in the system: HUD headquarters staff only. This is about 10 persons. The system makes use of Role-Based Authentication.</li> </ul> <p>Limited/restricted access rights to only selected data: All other system users</p>
	<p>Are disks, tapes, and printouts that contain personal information locked in cabinets when not in use? (explain your procedures, or describe your plan to improve): User ID requests listing the name and address of the grantee user are stored in a locked cabinet.</p>
	<p>If data from your system is shared with another system or data warehouse, who is responsible for protecting the privacy of data that came from your system but now resides in another? Explain the existing privacy protections, or your plans to improve: N/A</p>
	<p>Other methods of protecting privacy (specify): Protected data is not released as part of a FOIA request. Activity names will not be given to those requesting activity information. Instead, activities will be identified solely by activity number when given to non-HUD employees.</p>
	Comment:

**Question 7: If privacy information is involved, by what data element(s) is it retrieved from the system?**

Mark any that apply

<input checked="" type="checkbox"/>	Name and Activity name
<input type="checkbox"/>	Social Security Number (SSN)
<input type="checkbox"/>	Identification number (specify type):
<input type="checkbox"/>	Birth date
<input checked="" type="checkbox"/>	Race/ ethnicity: Race and ethnicity
<input type="checkbox"/>	Marital status
<input type="checkbox"/>	Spouse name
<input checked="" type="checkbox"/>	Home address Activity Address
<input type="checkbox"/>	Home telephone
<input type="checkbox"/>	Personal e-mail address
<input checked="" type="checkbox"/>	Other (specify): Income
<input type="checkbox"/>	None
<input type="checkbox"/>	Comment:

**Question 8: What type of Notice(s) are provided to the individual on the scope of information collected, the opportunity to consent to uses of said information, the opportunity to decline to provide information.**

- a. Was any form of notice provided to the individual prior to collection of information? If yes, please provide a copy of the notice as an appendix. (A notice may include a posted privacy policy, a Privacy Act notice on form(s), and/or a system of records notice published in the Federal Register.) If notice was not published, why not?**

Currently, there is no privacy notice in the system.

- b. Do individuals have an opportunity and/or right to decline to provide information?**

Individuals don't apply – it's organizations that apply for grants. They collect the information they need to manage the activity.

- c. Do individuals have an opportunity to consent to particular uses of the information, and if so, what is the procedure by which an individual would provide such consent?**

Individuals don't apply – it's organizations that apply for grants.

### **SECTION 3 - DETERMINATION BY HUD PRIVACY ACT OFFICER**