

U.S. Department of Housing and Urban Development

HOUSING

SINGLE FAMILY INSURANCE SYSTEM (SFIS) A43

Privacy Impact Assessment

May 9, 2013

Document Endorsement

I have carefully assessed the Privacy Impact Assessment (PIA) for **Single Family Insurance System (SFIS) A43**. 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.

/s/ Arthur G. Diver for

Shari Palumbo
Director, Office of Financial Services

5/10/2013
Date

/s/ Natalia Yee

Natalia Yee
Director, Single Family Insurance Operations
Division

5/10/2013
Date

Donna Robinson-Staton

Donna Robinson-Staton
Departmental Privacy Act Officer
Office of the Chief Information Officer
U. S. Department of Housing and Urban
Development

5/9/2013
Date

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**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
PRIVACY IMPACT ASSESSMENT (PIA) FOR:
SINGLE FAMILY INSURANCE SYSTEM (SFIS) A43
(for IT Systems: [Insert OMB Unique Identifier]
and PCAS # 00251140**

May 9, 2013

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](#));
- 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) 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 \(HUD Handbook 1327.1 at www.hudclips.org\)](#));
- [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; see also the summary of the E-Government Act at http://www.whitehouse.gov/omb/egov/pres_state2.htm);
- [Federal Information Security Management Act of 2002](#) (which superseded 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 \(http://www.whitehouse.gov/omb/circulars/a130/appendix_i.pdf\)](#) 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](http://www.usdoj.gov/foia/privstat.htm), 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: Office of Housing

Subject Matter Expert in the Program Area: Pauline Devore, Chief, Systems Management Branch, Office of Housing, (202) 402-8311

Program Area Manager: Natalia Yee, Director, Single Family Insurance Operations Division, Office Of Housing, (202) 402-3506

IT Project Leader: Donna Thomas, IT Specialist, Office of Systems Integration and Efficiency, Office of the Chief Information Officer, (202) 402-7612; Sheila Alpers, Computer Specialist, Office of Enterprise Program Management Division, Office of the Chief Information Office, (202) 402-7610

For IT Systems:

- **Name of system:** [Single Family Insurance System \(SFIS\)](#)
- **PCAS #:** [00251140](#)
- **OMB Unique Project Identifier #:**
- **System Code:** [A43](#)
- **Development Date:** [1983](#)
- **Expected Production Date:** [1983](#)

For Information Collection Requests:

- **Name of Information Collection Request:** Servicer/Holder Transfer (HUD Form 92080) and Insurance Termination (HUD Form 27050-A). Personal information is obtained through Computerized Homes Underwriting Management System (CHUMS).
- **OMB Control #:** OMB No. 2535-0087 for HUD Form 92080 and OMB No. 2502-0414 for HUD Form 27050-A.

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)

Personal Identifiers:

<input checked="" type="checkbox"/>	Name Borrower and co-borrower(s)
<input checked="" type="checkbox"/>	Social Security Number (SSN)
<input checked="" type="checkbox"/>	Other identification number FHA case number
<input checked="" type="checkbox"/>	Birth date
<input checked="" type="checkbox"/>	Home address
	Home telephone
	Personal e-mail address
	Fingerprint/ other “biometric”
	Other (specify):
	None
<input checked="" type="checkbox"/>	Comment: SFIS is a repository for all single family insurance loans data with exception of Home Equity Conversion Mortgage (HECM) loans. This information is collected via CHUMS in order to be able to address servicing inquiries from lenders, homeowners, and government entities. Upon non-claim termination (i.e., prepayment, assignment, assumption, or refinance), the borrower may be eligible for a refund of any unearned upfront mortgage insurance premium. The data is used to validate the information provided by the lender at termination and to generate the refund, if applicable.

Personal/ Sensitive Information:

<input checked="" type="checkbox"/>	Race/ ethnicity
<input checked="" type="checkbox"/>	Gender/ sex
	Marital status
<input checked="" type="checkbox"/>	Spouse name
	# of children

	Income/ financial data (specify type of data, such as salary, Federal taxes paid, bank account number, etc.):
	Employment history:
	Education level
	Medical history/ information
	Disability
	Criminal record
	Other (specify):
	None
	Comment:

b. From whom is the information collected (i.e., government employees, contractors, or consultants)? The information is collected from lenders via CHUMS.

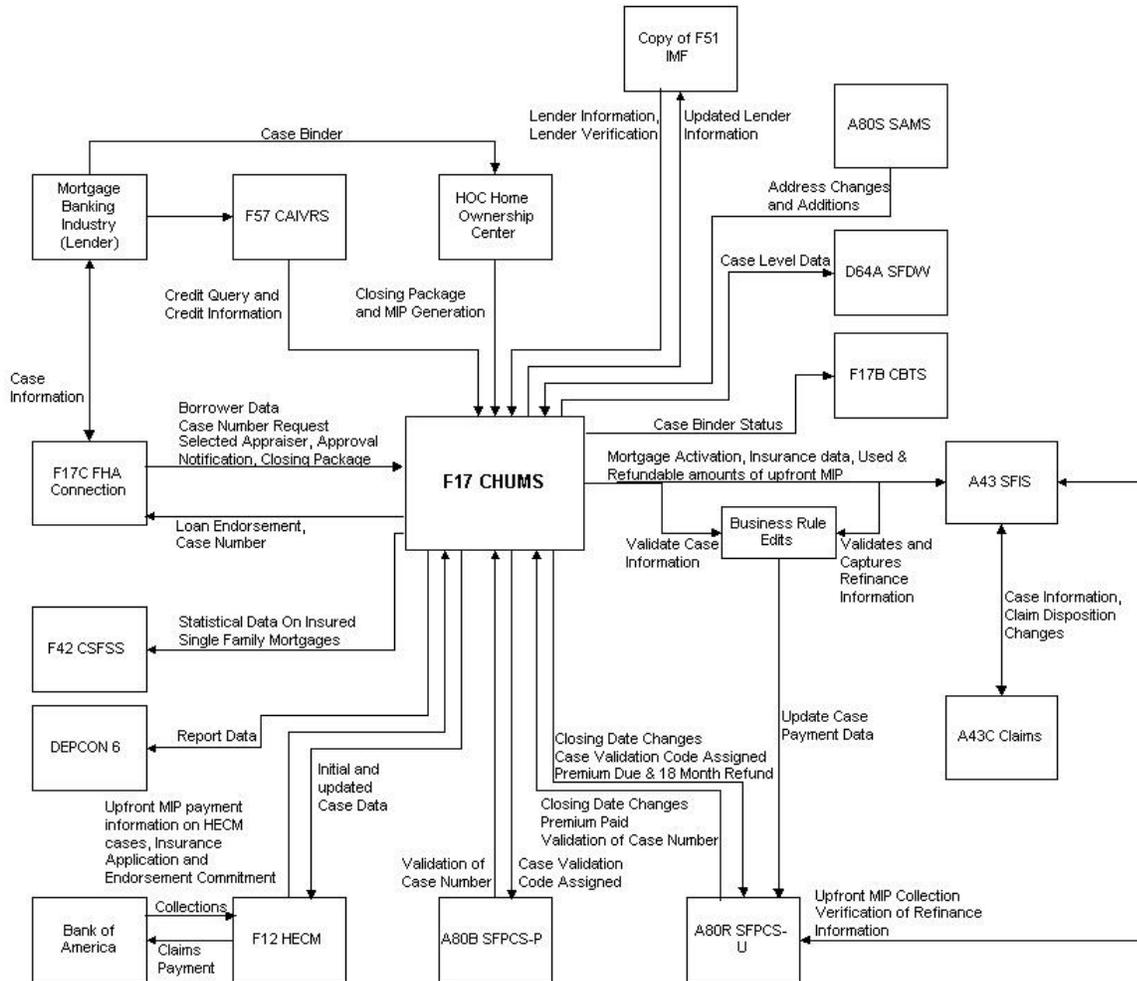
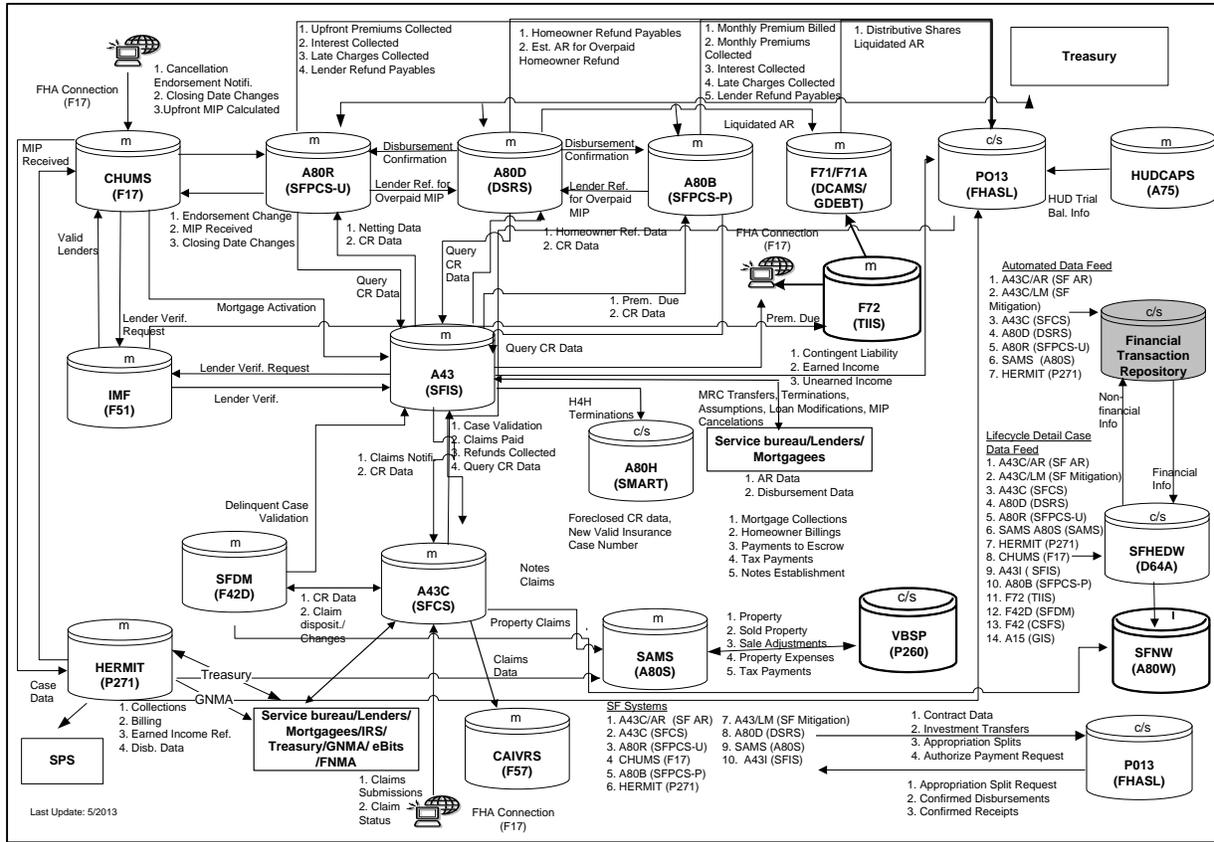
c. What is the functionality of the system and the purpose that the records and/or system serve?

The Single Family Insurance System (SFIS) is used to maintain the insurance-in-force (IIF) database, which contains accurate and detailed case information on FHA-insured single family properties. When the SFIS became operational in 1983, the IIF was initially loaded with information about several million active FHA cases in the single family mortgage insurance inventory and information on terminated cases from 1972 onward.

SFIS allows on-line access to FHA case information and is used to make inquiries and process actions on single family mortgages insured by HUD. Updates to the IIF are performed both online and by batch processing. Reports are produced daily, weekly, monthly, quarterly, annually, and upon request. The SFIS process begins with endorsement of a case and continues through termination of the case and maintenance of post-termination case history.

d. How information is transmitted to and from the system; see system diagrams below

e. What are the interconnections with other systems. see system diagrams below



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)?

The authorization for the collection of information is referenced in **Part III – Notice to Borrowers** of form HUD-92900-A, Mortgagee Credit Analysis Worksheet (MCAW). Also, this includes 12 U.S.C. 1701, the Debt Collection Act of 1982 (PL 97-365), and the Housing and Community Development Act of 1987 (42 U.S.C. 3543).

Part III - Notices to Borrowers. Public reporting burden for this collection of information is estimated to average 6 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection information unless that collection displays a valid OMB control number can be located on the OMB Internet page at http://www.whitehouse.gov/omb/library/OMB/INVENTORY.LIST.OF.AGENCIES.html#LIST_OF_AGENCIES. Privacy Act Information. The information requested on the Uniform Residential Loan Application and this Addendum is authorized by 38 U.S.C. 3710 (if for DVA) and 12 U.S.C. 1701 et seq. (if for HUD/FHA). The Debt Collection Act of 1982, Pub. Law 97-365, and HUD's Housing and Community Development Act of 1987, 42 U.S.C. 3543, require persons applying for a federally insured or guaranteed loan to furnish his/her social security number (SSN). You must provide all the requested information, including your SSN. HUD and/or VA may conduct a computer match to verify the information you provide. HUD and/or VA may disclose certain information to Federal, State and local agencies when relevant to civil, criminal, or regulatory investigations and prosecutions. It will not otherwise be disclosed or released outside of HUD or VA, except as required and permitted by law. The information will be used to determine whether you qualify as a mortgagor. Any disclosure of information outside VA or HUD/FHA will be made only as permitted by law. Failure to provide any of the requested information, including SSN, may

Question 2: Type of electronic system or information collection?

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

B. If this is existing electronic system has the system undergone any changes (since April 17, 2003)? Yes, new enhancements and releases. If an existing system, when was the system developed? 1983	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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? No	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If yes, please explain: No new information is being collected. However, the display has been updated to allow staff to query more efficiently.		

<p>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):</p>	
N/A	Conversion: When paper-based records that contain personal information are converted to an electronic system
N/A	From Anonymous (Non-Identifiable) to “Non-Anonymous” (Personally Identifiable): When any systems application transforms an existing database or data collection so that previously anonymous data becomes personally identifiable
N/A	Significant System Management Changes: 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	Merging Databases: 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	New Public Access: 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	Commercial Sources: 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	New Inter-agency Uses: When agencies work together (such as the federal E-Gov initiatives), the lead agency should prepare the PIA
N/A	Business Process Re-engineering: When altering a business process results in significant new uses, disclosures, or additions of personal data
N/A	Alteration in Character of Data: 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)

<p>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? 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.</p>	
	Yes, this is a new ICR and the data will be automated
X	No, the ICR does not require a PIA because it is not <u>new</u> or <u>automated</u>)
	Comment:

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)
X	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
X	Issuing mortgage and loan insurance
	Other (specify):
X	Comment: The PII information collected is used to service FHA mortgage loans and for HUD staff to be able to address questions from lenders for loans that lenders service or hold.

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:

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)

Mark any that apply:

X	Federal agencies?
	State, local, or tribal governments?
	Public Housing Agencies (PHAs) or Section 8 property owners/agents?
X	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)
	Others? (specify):
	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. Users log on to the HUD LAN via a log-in screen that asks for the user ID (H number) and password. After authentication, the user must log on to SFIS (selects the system from the HUD systems menu). The log in also consists of entering the user ID and password. Top Secret is used for authentication.
X	<p>When an employee leaves:</p> <ul style="list-style-type: none"> • How soon is the user ID terminated? (1 day, 1 week, 1 month, unknown)? Users are removed within one business day of notification by the employee’s supervisor, a HUD GONE request, or by management, • How do you know that the former employee no longer has access to your system? The Systems Security Administrator performs a Quarterly Review of all individuals who have access to the system. Managers subsequently review this list against requests to have employees removed. (explain your procedures or describe your plan to improve):
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"> • Full access rights to all data in the system: 5 <p>Limited/restricted access rights to only selected data: 695</p>
X	<p>Are disks, tapes, and printouts that contain personal information locked in cabinets when not in use? Yes, all sensitive information is kept in locked file rooms. (explain your procedures, or describe your plan to improve):</p>
X	<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? The owners of the other system. Explain the existing privacy protections, or your plans to improve:</p>
	<p>Other methods of protecting privacy (specify):</p>
	<p>Comment:</p>
	<p>Privacy Impact Analysis: Given the access and security controls, what privacy risks were identified and describe how they were mitigated. A43 (SFIS) follows National Institute of Standards and Technology (NIST) standards for security compliance in compliance with Federal Information Security Management Act guidance for system development and maintenance. Additionally, privacy compliance assessments are performed to mitigate the risk to HUD data. These assessments include Privacy Impact Assessments (PIA) and System of Record Notices (SORN).</p>

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:
<input checked="" type="checkbox"/>	Social Security Number (SSN)
<input checked="" type="checkbox"/>	Identification number (specify type): FHA case number
<input checked="" type="checkbox"/>	Birth date
<input checked="" type="checkbox"/>	Race/ ethnicity
<input type="checkbox"/>	Marital status
<input type="checkbox"/>	Spouse name
<input checked="" type="checkbox"/>	Home address
<input type="checkbox"/>	Home telephone
<input type="checkbox"/>	Personal e-mail address
<input checked="" type="checkbox"/>	Other (Identification number (specify type): sex of borrower)
<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?** [Yes. At the time of home loan settlement, privacy disclosure information is provided to the homeowner. Disclosure information is on the settlement sheet \(see attached for form HUD-1\) and Importance Notice to Homebuyers \(see attached for form HUD-92900-B\). HUD regulations require the homeowner to provide PII information. The data is initially collected through the Computerized Homes Underwriting Management System \(CHUMS\) and once the loan is insured the information is provided to the Single Family Insurance System \(SFIS\) which maintains information for all single family insured loans with the exception of Home Equity Conversion Mortgage \(HECM\) loans. The confidentiality of this information by the HUD user of SFIS is documented in the Rules of Behavior \(see attached for Rules of Behavior document\).](#)

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?

- b. **Do individuals have an opportunity and/or right to decline to provide information?** Yes, however, if they want to obtain FHA insurance for their loan the borrower must provide the information to HUD through the lender.

- 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?** No.

Question 9: What are the Retention Use and Disposal Practices. Guidance for this section should obtain from HUD retention use and disposal policy. It should also be validated that these procedures are outlined in the contracted service agreement to ensure that the contracted system does not hold onto data after services are no longer provided.

- a. **How long is information retained?** The information is archived for an indefinite period of time. Also, the information in SFIS is provided to the Single Family Data Warehouse.

- b. **Has the retention schedule been approved by the component records officer and the National Archives and Records Administration (NARA)?** N/A

3.4 Privacy Impact Analysis: Please discuss the risks associated with the length of time data is retained and how those risks are mitigated.

The appropriate administrative controls are in place to ensure protection of the data collected and maintained by the Single Family Insurance System. Security controls are in place and issues are addressed in the SFIS risk assessment and mitigation plans.

SECTION 3 - DETERMINATION BY HUD PRIVACY Act officer

The Single Family Insurance System is a concern for privacy due to the personal/ sensitive information contained in the system. Based on Question # 6, we have determined that the appropriate administrative controls are in place to ensure protection of the data collected and maintained by the system. Approval of this assessment is recommended and that the review and/or update of the PIA for A43 is required by the Privacy Office no later than May 10, 2015.