

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

Office of Policy Development & Research

**Pre-Purchase Homeownership Counseling
Demonstration and Impact Evaluation**

Privacy Impact Assessment

December 5, 2012

DOCUMENT ENDORSEMENT

I have carefully assessed the Privacy Impact Assessment (PIA) for **[Insert Name of IT System and/ or Information Collection Request]**. 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/ Marina L. Myhre

12/5/2012

SYSTEM OWNER
[PROGRAM OFFICE]

Date

/s/Carol S. Star

12/5/2012

PROGRAM AREA MANAGER
[PROGRAM OFFICE]

Date

/s/ Donna Robinson-Staton

12/13/2012

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

Date

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**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
PRIVACY IMPACT ASSESSMENT (PIA) FOR:
PRE-PURCHASE HOMEOWNERSHIP COUNSELING DEMONSTRATION AND
IMPACT EVALUATION RANDOM ASSIGNMENT AND SERVICE TRACKING
(RAST) SYSTEM**

**(for IT Systems: [Insert OMB Unique Identifier]
and [Insert PCAS #])**

December 5, 2012

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 \(http://uscode.house.gov/search/criteria.php\)](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](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: Program Evaluation Division

Subject Matter Expert in the Program Area: Marina Myhre, Office of Policy Development and Research, Program Evaluation Division (202) 402-5705

Program Area Manager: Carol S. Star, Office of Policy Development and Research, Program Evaluation Division, (202) 402-6139

IT Project Leader: N/A, not an internal HUD system so no IT Project Leader

For IT Systems:

- **Name of system:** Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation Random Assignment and Service Tracking (RAST) System – not a HUD system
- **PCAS #:** N/A
- **OMB Unique Project Identifier #:** N/A
- **System Code:**
- **Development Date:** March 2013 is the expected deployment date for Project
- **Expected Production Date:**

For Information Collection Requests:

- **Name of Information Collection Request:** Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation
- **OMB Control #:**

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.

The Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation Random Assignment and Service Tracking (RAST) System is the data system for HUD's Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation, under contract C-OPC-22921, T003. This study will examine the impact that different types of pre-purchase homeownership counseling have on mortgage preparedness, homebuyer outcomes, and loan performance for prospective low-to-moderate income, first-time homebuyers. This evaluation will recruit 7,000 low-to-moderate income, first-time homebuyers who have gone to any of the three national lenders participation in this study to pre-qualify for a home purchase loan in any of the 28 study jurisdictions. Upon study enrollment, study participants will be randomly assigned to one of three research groups; two treatment groups (one for each intervention type) and a control group that will not receive any pre-purchase counseling services. The Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation Random Assignment and

Service Tracking (RAST) System will serve as the data system for this study. The research contractor will collect study participant consent, study participant personal information, eligibility criteria, baseline survey responses, counseling agency data on counseling services provided to the study participants, and loan origination and loan performance data from the three national lenders participating in the study, from the FHA database, and credit report information from a national credit reporting agency. This study is the third of three studies of HUD's Housing Counseling Program. A similar data system was developed and approved for the second study, Housing Counseling Outcome Evaluation, which just ended.

a. **What is the personal information being collected?**

Study Participant Intake Data: Name; Social Security Number; study identifier; birth date; contact information (home address, telephone numbers, e-mail address); co-borrower(s) on home loan; demographic characteristics of the household (e.g., race/ethnicity, gender, marital status); number of children and other adults in the household; income sources and total family income; employment and earnings for the household; co-borrower name and contact information; veteran's status, educational level; first-time homebuyer status; early-stage borrower status; reliable access to transportation; language competency (English or Spanish); prior experience completing pre-purchase counseling or education; regular access to a computer and internet; the stage in the home purchase process and preparedness for home purchase (e.g., the extent of respondents' home search prior to pre-qualification, intended down payment amount, expected timeline for home purchase); financial characteristics (e.g., income sources and total family income, financial literacy, non-housing savings/debts, budgeting activities, and employment and earnings, learning and planning preferences); participant's experience with the study's recruitment and enrollment process; random assignment of counseling services and whether or not study participants sought and received them; opinions on the pre-purchase counseling and education services study participants may have received; contact information for him or herself and the first and last name of a family members or friends.

Co-borrower(s) Intake Data: Name, Social Security Number

Lender Intake Data: Lender's Name; MSA/City/Branch; Data Transfer Date; Client's First Name; Client's Last Name; Address, City, State, Zip; Preferred Phone Number; Alternative Phone Number; Email; Date of Birth; Date customer gave consent for contact information to be sent to the study team; Date customer first contacted lender about home loan; Unique Customer Identifier; First-time homebuyer status; Presence of a co-borrower; Name and first-time homebuyer status of co-borrower(s);

Lender Origination and Loan Performance Data: Loan number; Date of closing; Purchase price; Monthly income; Back end ratio; Front end ratio; Down payment; Initial LTV; Mortgage type; Mortgage terms; Interest rate (*initial and information on any fixed period or adjustment caps for ARMs*); Closing costs and fees; Ever 30 days delinquent; Ever 90 days delinquent; Prepayment; Foreclosure; Bankruptcy; Updated mortgage balance; recruitment call outcomes and dispositions; recruitment call experiences;

HUD Administrative Data: Loan number; Date of closing; Purchase price; Monthly income; Back end ratio; Front end ratio; Down payment; Initial LTV; Mortgage type; Mortgage terms; Interest rate (*initial and information on any fixed period or adjustment caps for ARMs*); Closing costs and fees; Ever 30 days delinquent; Ever 90 days delinquent; Prepayment; Foreclosure; Bankruptcy; Updated mortgage balance;

Pre-Purchase Counseling and Education Data: First contact date with counseling agency; date of first online pre-purchase education session, how many times a study participant signs into online education system to complete all pre-purchase modules; length of time spent completing each module; if pre-purchase online education module was started, but not completed; date completed online pre-purchase education modules; test scores of online pre-purchase modules; date(s) of group education session(s); length of time of session(s); how many participants in group education/workshop; how many household members attended; date of first telephone counseling session; length of time for telephone counseling session; date of in-person counseling session; length of time for in-person counseling session; topics covered during counseling session; counselor's name and position at agency; action steps before or during counseling session, recommendations to study participants; counseling and education outcomes; general information about housing counseling agency (mission, lead agency, budget, partnerships, target population); staff requirements, number of staff, training for staff; contacting study participants; type of pre-purchase education delivered; topics covered; type of pre-purchase counseling delivered; topics covered; collecting service tracking data; and experience participating in study.

Equifax Data: Risk scores (Vantage Score and Beacon 09/FICO); Total non-housing debt balance; Sum of balances for all open auto finance accounts on file with update within the last 3 months; Sum of balances for all open bankcard accounts on file with update within the last 3 months; Sum of balances for all open personal finance/student loan accounts on file with update within the last 3 months; Total monthly payment non-housing debt; Total monthly payment auto debt; Total monthly payment credit card debt; Total monthly payment student loan debt; Individual's monthly housing expenses (for numerator of front-end-ratio); Individual's monthly debt payments (for numerator of back-end-ratio); Indicator for loan type (e.g. FHA, VA, conventional); Indicator for whether a home was purchased since enrollment; Date of home purchase/closing if home was purchased since enrollment; Total housing debt balance; Total monthly payment on housing debt; Housing debt from first mortgage; Monthly payment on housing debt from first mortgage; Housing debt from subordinate mortgage(s); Monthly payment on housing debt from subordinate mortgage(s); Total HELOC balance; HELOC balance on first mortgage; HELOC balance on subordinate mortgages; Total HELOC monthly payment HELOC monthly payment on first mortgage; HELOC monthly payment on subordinate mortgages; Indicator for whether a mortgage was refinanced; Indicator for presence of a subordinate mortgage; Ever 30 days past due on mortgage payment within the past 12 months; Ever 60 days past due on mortgage payment within the past 12 months; Ever 90 days past due on mortgage payment within the past 12 months; Ever 120 days past due on mortgage payment within the past 12 months; Number of first mortgage accounts on file with any of the following within the last 24 months: charge off, bankruptcy, internal collection (i.e. collection being handled by original creditor and not a third party); Number of home equity line accounts on file with any of the following ever: charge off, bankruptcy, internal collection (i.e. collection being handled by original creditor and not a third party); Experienced bankruptcy since enrollment; and Experienced foreclosure since enrollment.

- b. From whom is the information collected (i.e., government employees, contractors, or consultants)?**

Study participants, study participating lenders and counseling agencies, third parties (credit bureau and U.S. Postal Service), administrative data from HUD

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

The system serves as a central data collection point that sits between the study team, interviewers, and study participating lenders and counseling agencies. The system will also provide the research team reports and output on the data that has been collected. The data is not to be used by the lenders or agencies for any purpose.

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

The study team, lenders, interviewers, and counseling agencies will either manually enter data through a secure web form or upload data into the system via a file transfer service. The study team will execute Data Use Agreements (DUAs) with the owners of any other systems with whom we share data, committing them to restrict usage of the data to the purpose to which it is provided and applying technical controls to limit access to those persons who need it for project purposes. The DUAs will also commit the other entities to destroying the data at the end of the project.

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

This system will not be connected with other systems.

- 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)?**

12 U.S.C. §1701z-1 established PD&R and its authority to conduct research. 12 U.S.C. 1701z-2(g) Information and data, gives PD&R the authority to request personal information from people. HUD promises confidentiality as stated in the Privacy Act of 1974 (5 U.S.C. 552a), Records Maintained on Individuals, and obtains consent from individual study participants as part of the enrollment in the study. The findings from the study will be publicly reported only at the aggregate level; neither individual clients nor participating housing counseling agencies will be identified in the study reports.

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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does the system require authentication?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the system browser-based?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the system external-facing (with external users that require	<input checked="" type="checkbox"/>	<input type="checkbox"/>

authentication)?		
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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? _____	Yes <input type="checkbox"/>	No <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?	<input type="checkbox"/>	<input type="checkbox"/>
If yes, please explain:		

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	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)

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.	
<input checked="" type="checkbox"/>	Yes, this is a new ICR and the data will be automated
<input type="checkbox"/>	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 is being collected? How will it be used?

Mark any that apply:

Homeownership:

<input checked="" type="checkbox"/>	Credit checks (eligibility for loans) – only credit report data for evaluation of changes in credit score, wealth, savings, and home mortgage loan performance.
<input type="checkbox"/>	Loan applications and case-binder files (via lenders) – including borrower SSNs, salary, employment, race, and other information
<input type="checkbox"/>	Loan servicing (MIP collections/refunds and debt servicing for defaulted loans assigned to HUD)
<input type="checkbox"/>	Loan default tracking
<input type="checkbox"/>	Issuing mortgage and loan insurance
<input checked="" type="checkbox"/>	Other (specify):
	Comment: The Department of Housing and Urban Development (HUD) seeks to understand the impact of pre-purchase homeownership counseling on a range of outcomes for low-to-moderate income, first-time homebuyers. After the study participants have provided their consent to collect personally identifying information on them, the study team will collect study participants’ income; and loan application, origination, and tracking information from the three lenders participating in the study, loan performance data from the FHA database, and credit report data on the study participants through a contract with Equifax.

Rental Housing Assistance:

<input type="checkbox"/>	Eligibility for rental assistance or other HUD program benefits
<input type="checkbox"/>	Characteristics on those receiving rental assistance (for example, race/ethnicity, # of children, age)
<input type="checkbox"/>	Property inspections
<input type="checkbox"/>	Other (specify):
<input type="checkbox"/>	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:

	Federal agencies?
	State, local, or tribal governments?
	Public Housing Agencies (PHAs) or Section 8 property owners/agents?
X	FHA-approved lenders?
X	Credit bureaus?
X	Local and national organizations?
	Non-profits?
	Faith-based organizations?
	Builders/ developers?
	HUD module/application? (specify the module(s)/application(s) name)
X	Others? (specify): Contractors. Data will also be disclosed to make public use of

	file in non-identifiable form for disclosure to authorized researchers for additional statistical analysis. Results of the study will be shared in aggregate form without the use of PII.
	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. If the individual agrees to participate and he/she doesn’t withdraw that participation at any time, then they agree to provide their personal information for purposes of the full study (demonstration and impact evaluation) and they cannot “opt-out” or consent only to particular use.
	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): Complex password for remote access by authorized research personnel and staff at lenders and counseling agencies.
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<p>X</p>	<p>When an employee leaves:</p> <ul style="list-style-type: none"> • How soon is the user ID terminated? <i>1 day</i> (1 day, 1 week, 1 month, unknown)? • How do you know that the former employee no longer has access to your system? (explain your procedures or describe your plan to improve): <p><i>For the employee termination process, user IDs are terminated and removed from the project active staff list. If a lender, interviewer, or counseling agency employee leaves, the point of contact will notify the system manager and the user ID will be removed from the system.</i></p>
<p>X</p>	<p>Are access rights selectively granted, depending on duties and need-to-know? <i>Yes</i> 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: Approximately 10 <p>Limited/restricted access rights to only selected data:</p> <ul style="list-style-type: none"> • Approximately 15 research team members will have access to data directly collected by interviewers, lenders, and counseling agencies. • Approximately 10 Abt SRBI interviewers will have access to data reported from study participants. • Approximate number of users for lenders and counseling agencies cannot be reported at this time because recruitment of those agencies must wait until after OMB clearance. However, each data user's permissions will be defined based on the user's role on the project. For example, staff at counseling agencies will only have access to provide information on clients assigned to their intervention in their jurisdiction.
<p>X</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):</p> <p><i>Yes. The study interviewers will securely store any hard copy documents with personal protected information. Study team members will use study IDs in lieu of personal protected information on study documents and communication whenever feasible to limit risk of unauthorized disclosures.</i></p> <p><i>All hard copy forms with personal identifying data will be stored securely in a locked cabinet that can only be accessed by authorized individuals working on the data. The locked cabinet will be stored in a locked office in a limited access building.</i></p> <p><i>Hard copy forms that are no longer needed for the study will be shredded. If study interviewers do not have access to a paper shredder, they will submit the paperwork to the Abt Project Director via FedEx with clear instructions to destroy the documents upon receipt.</i></p> <p>Additional safeguards include:</p> <ul style="list-style-type: none"> • <i>All personal data will be maintained on a secure workstation or server that is</i>

protected by a firewall and complex passwords, in a directory that can only be accessed by the network administrators and the analysts actively working on the data.

- Data files used for analysis will be stored in a separate location from files with identifying information to minimize the risk that an unauthorized user could use the unique identification number to link de-identified files with the identifiers.
- Access rights to the data are granted to limited researchers on a need-to-know basis, and the level of access provided to each researcher is based on the minimal level required that individual to fulfill his research role.
- Abt Associates will back-up the data on a regular basis and stored offsite to reduce the effects system failures or disasters. Backup media will be encrypted. Data will never be stored on a laptop or on a movable media such as CDs, diskettes, or USB flash drives without encryption.
- If an authorized researcher leaves employment or is no longer working on this project, their user ID and access will be terminated within one day. These steps will be documented as part of termination process.
- Study team interviewers will securely store any hard copy documents with personal protected information, such as tracking letters.

SYSTEM SECURITY MEASURES: The availability and data in the Pre-Purchase Homeownership Counseling Demonstration and Impact Evaluation Random Assignment and Service Tracking System are important. The research team has established rigorous data security and confidentiality provisions that are documented as part of the study's Data Security Plan and in the Department's SORN and Privacy Impact Assessment. First, all data users will be aware of and trained on their responsibilities to protect participants' personal information, including the limitations on uses and disclosures of data. The study's RAST data system will be designed to limit access to data to authorized users with levels of access commensurate with each person's role on the project. The web server hosting the data system will be maintained in a secure facility with power back up, network redundancy, and system monitoring. In addition, daily back up of the server will be maintained at the data center and an off-site location. The RAST will be password protected, and access will be provided after user authentication. In the case of a forgotten password, the system will email the password to the registered user's email address.

An assurance of confidentiality is included in the study participation consent agreement through which participants will provide informed consent. An assurance of confidentiality also will be made to all respondents as part of the introduction to each of the surveys. For both survey data and corresponding administrative data on sample members, computer security will be maintained by passwords known only to a limited number of project staff members who need access to these files.

The following safeguards shall be used to secure data in storage, retrieval, during access, and disposal.

- All personal data will be maintained on a secure workstation or server that is

	<p>protected by a firewall and complex passwords, in a directory that can only be accessed by the network administrators and the analysts actively working on the data.</p> <ul style="list-style-type: none"> • Data files used for analysis will be stored in a separate location from files with identifying information to minimize the risk that an unauthorized user could use the unique identification number to link de-identified files with the identifiers. • Access rights to the data are granted to limited researchers on a need-to-know basis, and the level of access provided to each researcher is based on the minimal level required that individual to fulfill his research role. • Abt Associates will back-up the data on a regular basis and use offsite storage to reduce the effects of system failures or disasters. Backup media will be encrypted. Data will never be stored on a laptop or on a movable media such as CDs, diskettes, or USB flash drives without encryption. • If an authorized researcher leaves employment or is no longer working on this project, their user ID and access will be terminated within one day. These steps will be documented as part of termination process. • Study team interviewers will securely store any hard copy documents with personal protected information, such as tracking letters. <p>DATA QUALITY: Clients participating in the study will be asked to complete an eligibility assessment and baseline survey at the time they are enrolled in the study. Additionally, some study participants will be asked to participate in semi-structured follow-up interviews that seek to learn about participants’ experiences with enrollment and interaction with participating counseling agencies. Participating counseling agencies’ staff will be asked to participate in semi-structured interviews that seek to understand provision of counseling in each jurisdiction and provide the study team information on counseling and education services that study participants receive. Staff at lenders will be asked to participate in semi-structured interviews that seek to understand the recruitment process and provide the study team a weekly outcome report for recruitment calls. The purpose of these data collection activities is to collect the information needed to evaluate the impact of pre-purchase housing counseling</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:</p> <ul style="list-style-type: none"> • We will execute Data Use Agreements (DUAs) with the owners of any other systems with whom we share data, committing them to restrict usage of the data to the purpose to which it is provided and applying technical controls to limit access to those persons who need it for project purposes. The DUAs will also commit the other entities to destroying the data at the end of the project.
	<p>Other methods of protecting privacy (specify):</p>
	<p>Comment:</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): unique study ID
<input checked="" type="checkbox"/>	Birth date
<input type="checkbox"/>	Race/ ethnicity
<input type="checkbox"/>	Marital status
<input type="checkbox"/>	Spouse name
<input type="checkbox"/>	Home address
<input type="checkbox"/>	Home telephone
<input type="checkbox"/>	Personal e-mail address
<input type="checkbox"/>	Other (specify): Credit score, loan origination data, unique study ID, co-borrower's name and contact information
<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.

Our study interviewers will ask the potential borrowers interested in participating in the study for their consent to collect personal information and to share that information with the participating lenders, counseling agencies, FHA database, and credit bureau for the purposes of tracking their loan performance, counseling services received, and credit report data. Potential borrowers who are interested in participating in this study will be told about the information collected on them. Our study interviewers will verbally explain the consent process and answer any questions that study participants may have. Study interviewers will ask for study participants' consent and will digitally record the verbal consent received. The study interviewers are also conducting individual verification via name and date of birth to confirm that the individual the study interviewer is speaking with is the individual that agreed to have the lender share their contact information with the study team.

- 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?**

Prior to data collection, notice will be provided to the study participants in the form of a consent agreement, including a Privacy Act notice on the data

collection and disclosure requirements. Addition notice is provided in the form of a Privacy Act System of Records, PDR.RRE.01 that is expected to publish prior to the start of the data collection activities.

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

Yes, they can choose not to participate or can withdraw their participation from the study at any time after they have agreed to participate. However, if they agree to participate and do not withdraw their participation at any time, study participants must share their name, contact information, and social security number to participate in this study. This information is necessary to track loan origination data and loan performance for study participants.

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, Study participants cannot consent to particular use of the information, but they can withdraw from participating in the study at any time.

SECTION 3 - DETERMINATION BY HUD PRIVACY ACT OFFICER

The Office of Privacy has reviewed the PIA and has determined that there are proper security and privacy controls in place to protect the data from improper use and disclosure. PD&R agrees to revisit the PIA prior to deploying the new system to make subsequent changes resulting from new functionality and/or business requirement, if necessary.