

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

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**Multifamily Housing**

**Integrated Real Estate Management System - iREMS**

Privacy Impact Assessment

**April 2008**

## DOCUMENT ENDORSEMENT

I have carefully assessed the Privacy Impact Assessment (PIA) for the **Integrated Real Estate Management System (iREMS)**. 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/ George Eakin](#)

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## FINAL

# U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT PRIVACY IMPACT ASSESSMENT (PIA) FOR “INTEGRATED REAL ESTATE MANAGEMENT SYSTEM (iREMS)”

IT Systems: 025-09-01-02-01-1060-00  
PCAS # 00251480

April 2008

## 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](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](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](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

**Program Area:** Office of Multifamily Housing (MF) Programs

**Subject matter expert in the program area:** Lanier Hylton, Acting Director, Office of Program Systems Management, Housing (202) 708-4135 X 2510

**Program Area Manager:** Lanier Hylton, Acting Director, Office of Program Systems Management, Housing (202) 708-4135 X 2510

**IT Project Leader:** George Eakin, Office of Systems Integration and Efficiency, Office of the Chief Information Officer, (202) 708-4562 X 6236; Jacqueline Miller, Office of Systems Integration and Efficiency, Office of the Chief Information Officer, (202) 708-0517, Ext. 6085

### For IT Systems:

- **Name of system:** Integrated Real Estate Management System (iREMS)
- **PCAS #:** 00251480
- **OMB Unique Project Identifier #:** 025-09-01-02-01-1060-00
- **System Code:** F24

### For Information Collection Requests:

- **Name of Information Collection Request:**
- **OMB Control #:**

### Question 1: Provide a brief description of what personal information is collected.

Effective May 2<sup>nd</sup>, 2008, Multifamily Housing will begin the implementation phase of integrating the Real Estate Management System (REMS) into the new Integrated Real Estate Management System (iREMS), at this time iREMS will become the new system name. iREMS is HUD's multifamily property management tool for the Office of Multifamily Housing (MFH), the Departmental Enforcement Center (DEC), and the Public and Indian Housing/Real Estate Assessment Center (REAC). The system will collect, store, and maintain personal identifiable information (PII) from external business partners approved to do Multifamily business with HUD (e.g., property owners, management agents, owner/agent contacts, contract administrators). The sources of data are contractual agreements between HUD and property owners (e.g., Regulatory Agreement, Section 8 HAP contract) and memorandums to HUD from the business partners. The data collected is name, address, telephone number, fax number, email address, and tax id number/social security number.

If this automated system (or Information Collection Request) involves personally identifiable information on members of the public, then mark any of the categories that apply below:

#### Personal Identifiers:

X	Name
X	Social Security Number
X	Other identification number (specify type): The Property Identification or Contract ID, Tax Identification Number (TIN): The TIN is required for property owners, management agents, and contract administrators.

	Birth date
X	Home/Business Address
X	Home/Business telephone
	Personal e-mail address
	Fingerprint/ other "biometric"
	Other (specify)
	None
	Comment:

**Personal/ Sensitive Information:**

	Race/ ethnicity
	Gender/ sex
	Marital status
	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:

**Question 2: Will any of the personally identifiable information be accessed remotely or physically removed?**

If yes, Proceed to answering the following questions.	<input checked="" type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
Have the security controls been reviewed and approved by the Information Security Officer?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
What security controls are in place to protect the information? <b>Encryption</b>		
What HUD approved application is used to grant remote access? <b>The iREMS application is available via <i>VPN through</i>, accessed through HUD's secure systems connection front-end, enforced by the Web Access Security Subsystem (WASS). The WASS system uses a COTS package called SiteMinder by Computer Associates, which uses Microsoft Active Directory to validate internal users. Security for the Internet portion of iREMS is handled via a LDAP (Lightweight Directory Access Protocol) database, accessed by SiteMinder.</b>		
Comment:		

**Question 3: Type of electronic system or information collection.**

**A. If a new electronic system (or one in development):** Is this a new electronic system (implemented after April 2003, the effective date of the E-Government Act of 2002)?

If yes, fill out subsections a, b, and c.	<input checked="" type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>
a. Does the system require authentication?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Is the system browser-based?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Is the system external-facing (with external users that require authentication)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Comment		

**B. If an existing electronic system:** Mark any of the following conditions for your existing system that OMB defines as a “trigger” for requiring a PIA (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
N/A	<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
N/A	<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)

**C. If an Information Collection Request (ICR):** Is this a new Request that will collect data that will be in an automated 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 new request and the collected data will be in an automated system.

N/A	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> )
	Comment:

**Question 4: Why is the personally identifiable information being collected? How will it be used?**

**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
	Other (specify):
	Comment:

**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)
X	Property inspections
X	Other (specify): Establishes property ownership and management for financial assessment and physical inspections and will be used as the property management tool for the Office of Multifamily Housing (MFH), the Departmental Enforcement Center (DEC), and the Real Estate Assessment Center (REAC).
	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
X	Other (specify): REMS stored PII related to business partners to improve fiscal and regulatory control over HUD's multifamily housing portfolio and to ensure compliance with HUD program requirements. iREMs will continue this formal process.
	Comment:

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


**Question 5: Will you share the information with others? (e.g., another agency for a programmatic purpose or outside the government)?**

Mark any that apply:

	Federal agencies?
	State, local, or tribal governments?
X	Public Housing Agencies (PHAs) or Section 8 property owners/agents? (owner agent access was never turned on in REMS, and was not transitioned to iREMS)
	FHA-approved lenders?
	Credit bureaus?
	Local and national organizations?
	Non-profits?
	Faith-based organizations?
	Builders/ developers?
X	Others? All of REMS/iREMS interfaces are classified as internal within HUD.
	Comment:

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

<b>X</b>	System users must log-in with a password
<b>X</b>	When an employee leaves: <ul style="list-style-type: none"> <li>• How soon is the user ID terminated? (<b>1 day</b>, 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): <b>The employee is removed from the security Administrators log.</b></li> </ul>
<b>X</b>	Are access rights selectively granted, depending on duties and need-to-know? If Yes, the approximate of # <b>7208</b> authorized users who have either: <ul style="list-style-type: none"> <li>• Full access rights to all data in the system:</li> </ul> Limited/restricted access rights to only selected data: <b>Authorized access is controlled via the PIH-REAC security module WASS. Designated REMS security administrators assign functional roles on a need to know basis. In addition, a user must be assigned to a specific property to have update rights. With the exception of performance-based contract administrators, only HUD staff has access to the data. No contract staff has access to the production database.</b>
<b>N/A</b>	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):
<b>X</b>	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: <b>Access is provided based on userid/password for internal HUD employees only. Access is approved by the Office of Multifamily Housing Security Administrators. The data sharing is protected in accordance to the Privacy Act of 1974 requiring encryption of Privacy Act data. Systems who share our data use input control points as well.</b>
	Other methods of protecting privacy (specify):
	Comment:

**Question 8: If privacy information is involved, by what data elements can it be retrieved?**

<b>X</b>	Name:
<b>X</b>	Social Security Number (SSN)
<b>X</b>	Other identification number (specify type): <b>Property Identification or Contract ID , Tax Identification Number (TIN): The TIN is required field for property owners, management agents, and contract administrators. Tax Identification Number (TIN), which is used to uniquely identify a HUD business partner.</b>

	Birth date
	Race/ ethnicity
	Marital status
	Spouse name
	Home address
	Home telephone
	Personal e-mail address
	Other (specify):
	None
<b>X</b>	Comment: The primary fields for retrieving information from system are via the <b>Property Identification</b> or <b>Contract ID</b> . The other fields are used in some cases. During the initial retrieval of information it's possible to drill down into subordinate data with retrieving data under the fields noted above.

**Other Comments (or details on any Question above):**

**SECTION 3: DETERMINATION BY HUD PRIVACY ADVOCATE**

The iREM system does collect personal identifiable information (PII), which is a concern for privacy protection. Access rights to system are controlled by password, which restricts access to users with a business need-to-know. We have determined that Question # 7 justifies that there are adequate administrative controls in place for protecting personal information. iREMS is also classified as Privacy Act System of Records (SORNs), the SORN can be viewed in text form at: <http://www.hud.gov/offices/cio/privacy/fedreg.cfm>.