

**SECTION 8 ADMINISTRATIVE PLAN**

**APPENDIX K**

**POLICY FOR SAFEGUARDING PERSONAL IDENTIFIABLE  
INFORMATION (PII)**

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**Introduction**

Idaho Housing and Finance Association (IHFA) is committed to protecting the privacy of individual's information stored electronically, or in paper form, in accordance with Federal privacy laws, and guidance. Section 6 of the Housing Act of 1937, the Privacy Act of 1974, 5 U.S.C. 552a, The Freedom of Information Act (FOIA), 5 U.S.C. 552, and Section 208 of The E-Government Act are the primary Federal statutes that limit the disclosure of information about public housing residents and recipients of the Housing Choice Voucher program. In addition, the Housing and Community Development Act of 1987, 42 U.S.C. 1437d (q) (4), 42 U.S.C. 3543, and the Stewart B. McKinney Homeless Assistance Act of 1988, 42 U.S.C 3544, further regulate the treatment of information.

IHFA provides a Privacy Act notice to each assistance applicant at the time of the formal application, and to program participants at each annual recertification. This notice informs the applicant/participant about the information that IHFA collects, how the information will be used, and the penalties for misuse of the information.

**Definitions**

**Personal Identifiable Information (PII):** Information which can be used to distinguish or trace and individual's identity, such as their name, social security number, biometric records, etc., alone, or when combined with other personal identifying information which is linked or linkable to a specific individual, such as date and place of birth, or mother's maiden name.

**Sensitive Personal Identifiable Information:** PII that when lost, compromised, or disclosed without authorization could substantially harm an individual. Examples include social security or driver's license numbers, medical records, and financial account numbers such as credit or debit card numbers.

**Limiting the Collection of PII**

IHFA will collect and maintain only the information that is necessary to determine eligibility and the level of assistance an applicant/participant qualifies for. Prior to obtaining verification, IHFA will ensure Form HUD-9886, *Authorization for the Release of Information/Privacy Act Notice*, and IHFA's *Authorization for Release of Information* are signed and in the file.

IHFA uses the Department of Housing and Urban Development (HUD) Enterprise Income Verification (EIV) system as its preferred method of verification of income. IHFA also uses EIV to verify PII such as social security numbers and dates of birth. Once social security numbers are verified in EIV, IHFA will replace copies of social security cards with the EIV Individual

Control Number (ICN) page, which does not contain the entire social security number. Copies of social security cards will be shredded after removal from the file.

### **Managing Access to PII**

PII will be limited to those staff members with a need to access the data to perform their job duties in determining the applicant/participant portion of rent and/or program eligibility, program auditing, and compliance. The information will be printed and placed directly into the participant's file. PII will not be left on a voice mail message, discussed where unauthorized personnel, contractors, or guest may be present, or left on computer screens when away from work stations.

PII will not be shared with any household member other than the member for whom it belongs. Copies of a family member's PII may be given directly to that specific family member upon request, and will be stamped "Copy".

PII of minors may be shared with the minor's parents or guardian. PII in a participant's file may be viewed by HUD/OIG and auditors. PII may be released when ordered by court subpoena, or to a specific individual (i.e. an attorney) when a signed release of information to a third-party has been received from the individual.

### **Protecting Hard Copy and Electronic Files Containing PII**

IHFA will stamp the outside of all files containing PII with the word "Confidential", and store them in locked cabinets. Tenant files will not be left out in the open where unauthorized persons may have access to them, or stored on a computer that can be accessed by unauthorized persons.

An Acknowledgement of Receipt of Keys is required for any staff member who is issued keys. By signing the Acknowledgement of Receipt of Keys, the staff member certifies his/her understanding that keys may not be copied, given to anyone else, and may not be used to give access to unauthorized persons. The acknowledgment also provides a statement that the staff member understands the penalties for unauthorized disclosure of EIV and sensitive PII.

### **Protecting Electronic Transmission of PII via Fax or Email**

Before faxing PII, IHFA will confirm the fax number, availability of the recipient, and that he/she received the fax. IHFA will not send PII to a central fax machine that is not a secure transmission line. Before sending PII via email, IHFA will either encrypt the information, or send it as a password protected attachment, with the password sent under separate email.

### **Protecting Hard Copy Transmissions of Files Containing PII**

IHFA will not use interoffice or translucent envelopes to mail PII. The outside of the envelope will be addressed to a specific person's attention.

When sending PII through the US Postal Service to another housing authority for a participant who is moving under portability, IHFA will first place the information in an envelope, marking the outside “Confidential-Privacy Act Information Enclosed”. This envelope will then be placed inside another envelope and addressed to a specific recipient’s attention.

### **Records Management, Retention, and Disposition**

IHFA will not maintain records longer than required. When a file has been retained for the specified amount of time, IHFA will dispose of the file by shredding it. IHFA will keep a log of all shredded files containing PII.

### **Incident Response**

Supervisors will ensure that all personnel are familiar with reporting procedures. IFHA requires that each employee who has access to PII information attends annual Security Awareness Training.