



**U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT**

Privacy Threshold Analysis

**[Single Family Premium Collections Subsystem-
Upfront]
[SFIOD]**

July 2015

[7/28/15]

PRIVACY THRESHOLD ANALYSIS (PTA)

Please use the PTA is to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002.

Please complete this form and send it to the HUD Privacy Branch:

Janice Noble
Acting, Branch Chief
Privacy Branch
U.S. Department of Housing and Urban Development

Privacy@hud.gov

Upon receipt, the Privacy Branch will review this form. If a PIA is required, the Privacy Branch will send you a copy of the Official Privacy Impact Assessment Guide and accompanying Template to complete and return.

A copy of the Guide and Template is available on the HUD Privacy Branch website, <http://hudatwork.hud.gov/HUD/cio/po/i/privacy>, on HUD@Work and directly from the HUD Privacy Branch via email: privacy@hud.gov

PRIVACY THRESHOLD ANALYSIS (PTA) SUMMARY INFORMATION

Date Submitted for Review:

Name of Project: [SFPCS-U](#)

System Name in CSAM: [A80R- Premium Coll. Subsystem](#)

Name of Program Office: [Single Family Insurance Operations Division](#)

Name of Project Manager: [Catherine Degges](#)

Email for Project Manager: Catherine.A.Degges@hud.gov

Phone Number for Project Manager: [\(202\) 402-7604](#)

Type of Project:

- Information Technology and/or System
- A Notice of Proposed Rule Making or a Final Rule:
- Form or other Information Collection:
- Other: [<Please describe the type of project including paper based Privacy Act system of records.>](#)

SPECIFIC QUESTIONS

1. Describe the project and its purpose:

Single Family Premium Collection Subsystem-Upfront SFPCS-U (A80R) is a major HUD system that was implemented in April of 1997 as a replacement for the One-Time Mortgage Insurance premium System. The system automates the collection of Federal Housing Administration (FHA) Upfront mortgage insurance premiums (MIPs). The SFPCS-U validates the premium amount remitted, assesses any additional late penalty and interest due, suspends payments with incorrect/inconsistent data, reconciles premiums paid between the underwriting and insurance in force systems, refunds excess premiums, and provides an audit trail by case through detailed accounting and case history entries. SFPCS-U receives the initial upfront premium payment to secure the mortgage insurance from HUD-to-lenders making Federal Housing Administration (FHA) loans.

2. Status of Project:

This is a new development effort.

This is an existing project.

Date first developed:

Date last updated:

<Please provide a general description of the update.>

3. From whom do you collect, process, or retain information on: (Please check all that apply)

HUD Employees

Contractors working on behalf of HUD

The Public

The System does not contain any such information.

4. Do you use or collect Social Security Numbers (SSNs)? (This includes truncated SSNs)

No.

Yes. Why does the program collect SSNs? Provide the function of the SSN and the legal authority to do so:

<Please explain the purpose of the collection, the function and the legal authority to collect, maintain or transmit the SSN.>

5. What information about individuals could be collected, generated or retained?

SFPCS-U is tasked with collection, reconciliation, refunding, and accounting processes for the Single Family Insurance Operations Division of the Office of Financial Services.

6. If this project is a technology/system, does it relate solely to infrastructure? [For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)]?

No. Please continue to the next question.

Yes. Is there a log kept of communication traffic?

No. Please continue to the next question.

Yes. What type of data is recorded in the log? (Please choose all that apply.)

Header

Payload Please describe the data that is logged.

[<Please list the data elements in the log.>](#)

7. Does the system connect, receive, or share Personally Identifiable Information with any other HUD systems?

No.

Yes. Please list the systems:

Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, LOI, etc.)?

8. Does the system meet all of the following requirements?

There will be a group of records under the control of an agency that contains a personal identifier (such as a name, date of birth, SSN, Employee Number, fingerprint, etc.) of U.S. citizens and lawful permanent residents;

Contains at least one other item of personal data (such as home address, performance rating, blood type, etc.); and

The data about the subject individual IS retrieved by the name or unique identifier assigned to the individual.

No.

Yes.

If yes is there an existing System of Record Notice?

No.

Yes.

9. Is there an Authorization to Operate record within OCIO's FISMA tracking system CSAM?

Unknown

No

Yes. Please indicate the determinations for each of the following:

Confidentiality: Low Moderate High

Integrity: Low Moderate High

Availability: Low Moderate High

**PRIVACY THRESHOLD REVIEW
(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)**

Date reviewed by the HUD Privacy Branch:

Name of the HUD Privacy Branch Reviewer: <Please enter name of reviewer.>

DESIGNATION

This is NOT a Privacy Sensitive System - the system contains no Personally Identifiable Information.

This IS a Privacy Sensitive System

Category of System

- IT System
- Legacy System
- HR System
- Rule
- Other: _____

Determination

- PTA sufficient at this time
- Privacy compliance documentation determination in progress
- PIA is not required at this time
- PIA is required
 - System covered by existing PIA:
 - New PIA is required
 - PIA update is required
- SORN not required at this time
- SORN is required
 - System covered by existing SORN:
 - New SORN is required

HUD PRIVACY BRANCH COMMENTS