

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Resident Opportunity & Self-Sufficiency
Service Coordinator Program Evaluation**

Office of Policy Development and Research

July 5th, 2017

PRIVACY THRESHOLD ANALYSIS

The Privacy Threshold Analysis (PTA) is a compliance form developed by the Privacy Branch to identify, across the Department, the use of Personally Identifiable Information (PII). The PTA is the first step in the PII verification process, which focuses on these areas of inquiry:

- Purpose for the information
- Type of information
- Sensitivity of the information
- Use of the information
- The risks to the information

Please use the attached form to determine whether a Privacy Impact Assessment (PIA) is required under the E-Government Act of 2002 or a System of Records Notice (SORN) is required under the Privacy Act of 1974, as amended.

Complete the form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to Marcus R. Smallwood, Acting Chief Privacy Officer, Privacy Branch, U.S. Department of Housing and Urban Development, 451 7th Street, SW, Room 10139, Washington, DC 20410 or privacy@hud.gov.

Upon its receipt from your program PLO, the HUD Privacy Branch will review the completed form. If it determines that a PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return to the Branch.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Resident Opportunity and Self-Sufficiency Service Coordinator (ROSS-SC) Program Evaluation		
Program:	Policy Development and Research (PD&R)		
CSAM Name (if applicable):	Click here to enter text.	CSAM Number (if applicable):	Click here to enter text.
Type of Project or Program:	Form or other Information Collection	Project or program status:	Development
Date first developed:	June 26, 2017	Pilot launch date:	Click here to enter a date.
Date of last PTA update:	June 26, 2017	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Marina L. Myhre		
Office:	PD&R	Title:	Social Science Analyst
Phone:	202-402-5705	Email:	Marina.L.Myhre@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Choose an item.

Please provide a general description of the project and its purpose so a nontechnical person could understand. If this is an updated PTA, please describe the changes and/or upgrades triggering the update to this PTA. If this is a renewal, please state whether there were any changes to the project, program, or system since the last version.

HUD awarded the ROSS-Service Coordinator Program Evaluation to the Urban Institute. The objective of this research is to analyze ROSS-SC grants to ascertain participation and outcome data, as well as the operations and activities undertaken by the service coordinators funded by ROSS-SC grants that have been active over the past three years (1) to see if the revised Logic Model helps to address some of GAO's concerns, (2) to help HUD determine whether it is "meeting the goals of effective and efficient use of resources" in the ROSS-SC program and (3) to develop a process to help HUD make such a determination in future fiscal years. The Urban Institute team has prepared an information collection to meet the contractual requirements that includes a survey of ROSS Service Coordinators and site visits to active ROSS-SC grantees where staff will be interviewed and program participants will be asked to participate in focus groups. All of the data that will be collected as part of the survey and site visits will be deidentified and not contain any PII. There is no system involved in this study.

2. Does this system employ the following technologies?

If you are using these technologies and want coverage under the respective PIA for that technology, please stop here and contact the HUD Privacy Branch for further guidance.

- Social Media
- Web portal¹ (e.g., SharePoint)
- Contact Lists
- Public website (e.g., A website operated by HUD, contractor, or other organization on behalf of HUD)
- None of these Urban Institute has their own secure web portal

3. From whom does the project or program collect, maintain, use, or disseminate information?

Please check all that apply.

- This program collects no personally identifiable information²
- Members of the public
- HUD employees/contractors (list programs)

¹ Informational and collaboration-based portals in operation at HUD, and its programs that collect, use, maintain, and share limited personally identifiable information (PII) about individuals who are "members" of the portal or "potential members" who seek to gain access to the portal.

² HUD defines personal information as "personally identifiable information," or PII, as any information that permits the identity of an individual to be directly or indirectly inferred, including any information that is linked or linkable to that individual, regardless of whether the individual is a U.S. citizen, lawful permanent resident, visitor to the U.S., or employee or contractor to the Department. "Sensitive PII" is PII, which if lost, compromised, or disclosed without authorization, could result in substantial harm, embarrassment, inconvenience, or unfairness to an individual. For the purposes of this PTA, SPII and PII are treated the same.

	<input type="checkbox"/> Contractors working on behalf of HUD <input type="checkbox"/> Employees of other Federal agencies <input checked="" type="checkbox"/> Other (e.g., business entity) ROSS-SC grantees and their staff, focus groups with ROSS-SC program participants
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4. What specific information about individuals is collected, generated, or retained?

Please provide a specific description of information collected, generated, or retained (such as full names, maiden name, mother's maiden name, alias, Social Security number, passport number, driver's license number, taxpayer identification number, patient identification number, financial account, credit card number, street address, internet protocol, media access control, telephone number, mobile number, business number, photograph image, x-rays, fingerprints, biometric image, template data (e.g., retain scan, well-defined group of people), vehicle registration number, title number, and information about an individual that is linked or linkable to one of the above (e.g., date of birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information, etc.

The study team will be collecting the information below as part of the Resident Opportunities for Self Sufficiency Service Coordinator (ROSS-SC) Program Evaluation as part of the four data collection activities: Site Visit Interviews, Focus Groups, Administrative Survey, and Service Coordinator Survey.

- Site Visit Interviews: full names, business phone numbers, business email addresses, job titles for the purpose of coordinating and conducting the site visits
- Focus Groups: full names, phone or mobile phone numbers for the purpose of scheduling the focus groups
- Administrative Survey: full names and business email addresses of service coordinators for the purpose of contacting the service coordinators to conduct the Service Coordinator Survey
- Service Coordinator Survey: race, ethnicity, birth year, level of education, years of work experience, professional certifications, range of total compensation; individual surveys will be linked with grantee identifier that will tell us employer and geography, but will not be identifiable by individual service coordinator.

The information that is being collected as part of the site visit interviews and focus groups is to enable the study team to do the qualitative data analysis and case studies. The information that is being collected as part of the administrative survey will be used to enable the study team to conduct the service coordinator survey. The information that is being collected as part of the service coordinator survey will be reported in the aggregate to present summary, aggregate level information about what the service coordinators do, what people they serve, and what their experience and qualifications are. All information will be reported in aggregate, and the aggregate data would be scrubbed prior to any data submission from us to HUD. Focus group participant data will be destroyed upon completion of each focus group. Site visit interview data will be scrubbed and any names, phone numbers, and business email addresses will be destroyed

upon completion of the site visit notes. In terms of the Administrative Survey, full names and business email addresses will be destroyed once the service coordinator is contacted for and completes the survey. No names, phone numbers, or business email addresses will be retained or linked to any other data provided by any of the service coordinators or focus group participants. The Urban Institute's Institutional Review Board, which provides an independent, rigorous, human subjects review, has reviewed and approved the methodology and instruments as providing sufficient human subject and privacy protection.

A 60-day Federal Register notice was published on May 16, 2017: "Resident Opportunity and Self-Sufficiency Service Coordinator (ROSS-SC) Program Evaluation," Docket No. FR-6003-N-03.

<p>4(a) Does the project, program, or system retrieve information about U.S. Citizens or lawfully admitted permanent resident aliens using personal identifiers?</p>	<p><input type="checkbox"/> No. Please continue to the next question.</p> <p><input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p> <ul style="list-style-type: none"> • Site Visit Interviews: full names, business phone numbers, business email addresses, job titles • Focus Groups: full names, personal phone or mobile phone numbers • Administrative Survey: full names and business email addresses of service coordinators • Service Coordinator Survey: race, ethnicity, birth year, level of education, years of work experience, professional certifications, range of total compensation; individual surveys will be linked with grantee identifier that will tell us employer and geography, but will not be identifiable by individual service coordinator.
<p>4(b) Does the project, program, or system have an existing System of Records Notice (SORN), that has already been published in the <i>Federal Register</i> that covers the information collected?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question.</p> <p><input type="checkbox"/> Yes. If yes, provide the system name and number, and the <i>Federal Register</i> citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system</p>
<p>4(c) Has the project, program, or system undergone any significant changes since the SORN?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question.</p> <p><input type="checkbox"/> Yes. If yes, please describe.</p>
<p>4(d) Does the project, program, or system use Social Security numbers (SSN)?</p>	<p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes.</p>

4(e) If yes to 4(d), please provide the specific legal authority and purpose for the collection of SSNs.	n.a.
4(f) If yes to 4(d), please describe the uses of the SSNs within the project, program, or system.	n.a.
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If a log of communication traffic is kept, please provide that information here.
4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
n.a.	

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list: Click here to enter text.
6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, etc.)?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please choose from the dropdown menu below: Choose an item. Please describe applicable information sharing governance in place:
7. Does the project, program, or system provide role-based training for personnel who have access, in addition to the annual privacy training required of all HUD personnel?	<input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: All Urban employees are required to complete an IRB online training course which, among other

³ Header: Information that is placed before the actual data. The header normally contains a small number of bytes of control information, which is used to communicate important facts about the data that the message contains and how it is to be interpreted and used. It serves as the communication and control link between protocol elements on different devices.

Payload data: The actual data to be transmitted, often called the payload of the message (metaphorically borrowing a term from the space industry!). Most messages contain some data of one form or another, but some actually contain none: they are used only for control and communication purposes. For example, these may be used to set up or terminate a logical connection before data is sent.

	<p>topics, covers the handling of PII in a research context. Any researcher that will handle any data with PII will also have to sign our staff confidentiality pledge and the HUD-Urban Institute Non-Disclosure Agreement.</p> <p>For the site visit data collection, all individuals involved in data collection (including those from EJP consulting) will complete the Urban human subject research certification, sign our staff confidentiality pledge, participate in our site visit training, and ensure data are stored on appropriately encrypted devices and transferred via SFTP to Urban.</p> <p>For the survey data collection, the data will be collected via Qualtrics (an online survey software platform), so no direct contact with individuals will occur and no PII will be collected. Hence, the survey will not require any particular role-based training for survey administration. However, all individuals involved with analysis will also have to sign our confidentiality pledge and ensure data are stored on appropriately encrypted devices.</p>
<p>8. Per NIST SP 800-53 Rev. 4, Appendix J, does the project, program, or system maintain an accounting of disclosures of PII to individuals/agencies who have requested access to their PII?</p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: No PII will be collected.</p> <p><input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown.</p> <p><input checked="" type="checkbox"/> No.</p> <p><input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

⁴ FIPS 199 (Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems) is used to establish security categories of information systems.

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Ron Hill
Date submitted to Program Privacy Office:	September 13, 2017
Date submitted to HUD Privacy Branch:	September 13, 2017
Program Privacy Liaison Officer Recommendation: <i>Please include recommendation below, including what new privacy compliance documentation is needed.</i>	
Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Conique key
Date approved by HUD Privacy Branch:	September 13, 2017
PTA Expiration Date:	Every three years

DESIGNATION

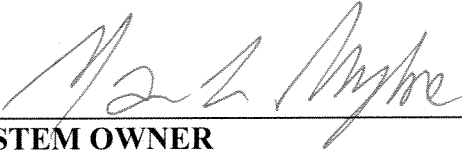
Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	<input type="checkbox"/> PTA sufficient at this time. <input type="checkbox"/> Privacy compliance documentation determination in progress. <input type="checkbox"/> New information-sharing arrangement is required. <input type="checkbox"/> HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. <input type="checkbox"/> Privacy Act Statement required. <input checked="" type="checkbox"/> Privacy Impact Assessment (PIA) required. <input checked="" type="checkbox"/> System of Records Notice (SORN) required. <input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer. <input type="checkbox"/> A Records Schedule may be required. Contact your program Records Officer.
PIA:	Choose an item. If covered by existing PIA, please list: Click here to enter text.

SORN:	Choose an item. If covered by existing SORN, please list: Click here to enter text.
HUD Privacy Branch Comments: <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSEMENT

DATE REVIEWED: 9/13/2017
PRIVACY REVIEWING OFFICIAL'S NAME: Conique Key

By signing below, you attest that the content captured in this document is accurate and complete and meet the requirements of applicable Federal regulations and HUD internal policies.



SYSTEM OWNER
Marina L. Myhre
Policy Development and Research

9/14/17

Date

9/14/2017

CHIEF PRIVACY OFFICER (acting)
Marcus Smallwood
OFFICE OF ADMINISTRATION

Date

