U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

PRIVACY THRESHOLD ANALYSIS (PTA)

National Family Self-Sufficiency
Program Demonstration
Office of Policy Development and Research

September 22, 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:	**National Family Self-Sufficiency 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:**	**Update**
Date first developed:	*Click here to enter a date.*	**Pilot launch date:**	Click here to enter a date.
Date of last PTA update:	*Click here to enter a date.*	**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:	**Regina C. Gray**		
Office:	**PD&R**	**Title:**	Social Science Analyst
Phone:	**(202) 402-2876**	**Email:**	regina.c.gray@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 National Family Self-Sufficiency Evaluation to MDRC. The primary goal of the Family Self-Sufficiency evaluation is to increase our knowledge about the effectiveness of FSS, which is aimed at helping housing-assisted populations secure and maintain employment and gain independence from public support programs. The implementation research will allow the research team to learn about the delivery of FSS services and how different service delivery practices may influence participation and program effectiveness. Information collected from staff will include data about staffing, program policies and approaches, case management practices, the goal-setting process, Program Coordinating Committees' involvement in service delivery, and program costs, among other topics. Information collected from participants will include motivation for joining FSS, selection of goals and progress toward goals, views about the escrow component, relationship with case managers, and reflections on their experience with the program in general. This type of information is only available through field research visits and interviews with staff and participants and cannot be obtained through administrative records or surveys.

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 portal[2] (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; MDRC has its 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 information[3] ☒ Members of the public ☐ HUD employees/contractors (list programs)

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[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.

	☐ Contractors working on behalf of HUD
	☐ Employees of other Federal agencies
	☒ Other (e.g., business entity)

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 date (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 indictors, employment information, medical information, education information, financial information, etc.

The MDRC research team will be collecting the information below as part of the National Family Self-Sufficiency Evaluation as part of the four data collection activities: Site Visit Interviews; Administrative Study; Implementation Analysis, and Cost-Benefit Analysis.

This section provides an overview of the five (four data collection protocols and one supplemental table) items submitted for clearance: Pre-interview Staff/PCC Table, a table to be completed by staff before the field visit; Protocol 1 – Supervisor (Site Visit); Protocol 2 – Case Manager; Protocol 3 – Participants; and Protocol 4 – Supervisor (Phone). FSS staff and participant experiences will be documented as part of this round of implementation research. During this round, MDRC will conduct structured in-depth interviews with approximately 36 staff members (3 PHA staff at each of nine PHAs in person and one PHA staff at each of nine PHAs by phone) and up to 90 participants (10 at each of nine sites) to learn about their experiences with and perspectives on the FSS program. The proposed interview protocols are included in this submission in Appendices A-E.

In developing the pre-interview table for staff completion and the interview protocols, we attempted to balance the need to capture a rich set of data against placing undue burden on the respondents, excluding items that—while potentially interesting—are not critical to understanding the implementation of the FSS program. Another goal was to keep the time allotted for each interview to a reasonable duration, thereby limiting respondent burden. This section provides a brief overview of the pre-interview table and the interview protocols.

IR3 Pre-interview Staff/PCC Table is a table shell for staff to complete prior to the research team coming onsite. It asks for basic information about program size, staffing levels and responsibilities, and the site's Program Coordinating Committee. The intention is to allow supervisors to complete this table on their own time, which will save time during the interview.

The following broad topics will be included in the supervisor and case manager interview protocols:

- General Program and Staffing (supervisors only)
  - o Policy updates
- Program Approach

- Case Management
  - Graduation
  - Escrow
- FSS Goal Setting
- PCC and Service Referral Network
- Program Costs (supervisors only)
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The following broad topics will be included in the participant interview protocol:

- Motivation for Joining FSS
- Goal-Setting and Progress toward Goals
- Relationship with Case Manager
- Services Used
- Escrow
- Overall Assessment and Recommendations

A 60-day Federal Register notice was published on Friday, July 14, 2017: "Family Self-Sufficiency Program Demonstration," **[Docket No. FR–6003–N–06]**

4(a) Does the project, program, or system retrieve information about U.S. Citizens or lawfully admitted permanent resident aliens using personal identifiers?	☐ No. Please continue to the next question. ☒ Yes. If yes, please list all personal identifiers used: Site Visit Interviews: protocols will use full names, business phone numbers, business email addresses, job titles Administrative Study: protocols will use full names, business phone numbers, business email addresses, job titles of FSS coordinators, managers, PHA Executive Director, supervisors, case managers FSS Study Participants: protocols will use full names, phone numbers, home addresses in accordance with informed consent.
4(b) Does the project, program, or system have an existing System of Records Notice (SORN), that has already been published in the *Federal Register* that covers the information collected?	☒ No. Please continue to the next question. ☐ Yes. If yes, provide the system name and number, and the *Federal Register* citation(s) for the most recent complete notice and any subsequent notices reflecting amendment to the system
4(c) Has the project, program, or system undergone any significant changes since the SORN?	☒ No. Please continue to the next question. ☐ Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security numbers (SSN)?	☒ No. ☐ Yes.
4(e) If yes to 4(d), please provide the specific legal authority and purpose for the	N/A

collection of SSNs.	
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? *For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?*	☒ No. Please continue to next question. ☐ Yes. If a log of communication traffic is kept, please provide that information here.

4(h) If header or payload data[4] is stored in the communication traffic log, please detail the data elements stored.
Click here to enter text. N/A

5. **Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?**	☒ No. ☐ 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?**	☒ No. ☐ Yes. If yes, please list: Click here to enter text.
6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, etc.)?	☒ No. ☐ 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?**	☐ No. ☒ Yes. If yes, please list: All MDRC personnel are required to complete an online IRB course, which, other topics, covers the handling of PII in a

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[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.

<table>
<tr><td></td><td>research context. Any researcher that will handle any data containing PII will also have to sign our staff confidentiality pledge and the HUD-MDRC Non-Disclosure Agreement.

For the site visit data collection exercise, all individuals involved in data collection (including subcontracting personnel) will complete the MDRC 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 MDRC.

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 questionnaire protocols will not require role-based training for its administration. However, all individuals involved with analysis are required to sign our confidentiality pledge and ensure data are stored on appropriately encrypted devices.</td></tr>
<tr><td>**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?**</td><td>☒ No. What steps will be taken to develop and maintain the accounting:
☐ Yes. In what format is the accounting maintained:</td></tr>
<tr><td>**9. Is there a FIPS 199 determination?[5]**</td><td>☐ Unknown.
☒ No.
☐ Yes. Please indicate the determinations for each of the following:
Confidentiality:
☐ Low ☐ Moderate ☐ High
Integrity:
☐ Low ☐ Moderate ☐ High
Availability:
☐ Low ☐ Moderate ☐ High</td></tr>
</table>

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[5] 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:	**Ronald M. Hill**
Date submitted to Program Privacy Office:	Click here to enter a date.
Date submitted to HUD Privacy Branch:	Click here to enter a date.
Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.*	
Click here to enter text.	

(TO BE COMPLETED BY THE HUD PRIVACY BRANCH)

HUD Privacy Branch Reviewer:	Click here to enter text.
Date approved by HUD Privacy Branch:	Click here to enter a date.
PTA Expiration Date:	Click here to enter a date.

DESIGNATION

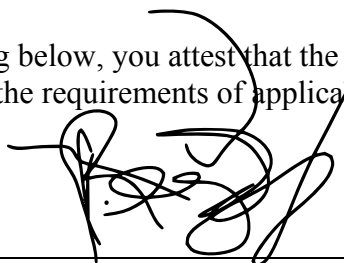|	
Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New information-sharing arrangement is required. ☐ HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies. ☐ Privacy Act Statement required. ☒ Privacy Impact Assessment (PIA) required. ☐ System of Records Notice (SORN) required. ☐ Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer. ☐ 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:
Please describe rationale for privacy compliance determination above.

Click here to enter text.

DOCUMENT ENDORSEMENT

DATE REVIEWED:11/20/2017
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.

11/20/2017

SYSTEM OWNER   **Date**
Regina Gray, Social Science Analyst, Affordable
Housing Research and Technology Division
Office of Policy Development and Research

CHIEF PRIVACY OFFICER   **Date**
Helen Goff Foster
OFFICE OF ADMINISTRATION