

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**Multifamily Housing Service Coordinator  
Program**

**OMB Control No.: 2502-0447**

**[December 19, 2018]**

## PRIVACY THRESHOLD ANALYSIS (PTA)

The PTA is a compliance form developed by the Privacy Branch to identify the use of Personally Identifiable Information (PII) across the Department. 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,
- And the risk to the information.

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

Please complete this form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to the HUD Privacy Branch:

John Bravacos, Senior Agency Official for Privacy  
Privacy Branch  
U.S. Department of Housing and Urban Development

[privacy@hud.gov](mailto:privacy@hud.gov)

Upon receipt from your program PLO, the HUD Privacy Branch will review this form. If a PCLIA or SORN is required, the HUD Privacy Branch will send you a copy of the PCLIA and SORN templates to complete and return.

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**SUMMARY INFORMATION**

<b>Project or Program Name:</b>	Multifamily Housing Service Coordinator Program		
<b>Program:</b>	Office of Housing		
<b>CSAM Name (if applicable):</b>	N/A	<b>CSAM Number (if applicable):</b>	<a href="http://www.Grants.gov">www.Grants.gov</a> , <a href="http://GrantSolutions.gov">GrantSolutions.gov</a> , and Electronic online Line of Credit Control System (eLOCCS)
<b>Type of Project or Program:</b>	Form or other Information Collection	<b>Project or program status:</b>	Existing
<b>Date first developed:</b>	N/A	<b>Pilot launch date:</b>	N/A
<b>Date of last PTA update:</b>	N/A	<b>Pilot end date:</b>	N/A
<b>ATO Status (if applicable)</b>	N/A	<b>ATO expiration date (if applicable):</b>	N/A

**PROJECT OR PROGRAM MANAGER**

<b>Name:</b>	Jessica Grantling		
<b>Office:</b>	Multifamily Housing	<b>Title:</b>	Program Analyst
<b>Phone:</b>	202-402-2521	<b>Email:</b>	Jessica.V.Grantling@hud.gov

**INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)**

<b>Name:</b>	Tracene Davis		
<b>Phone:</b>	202-402-5748	<b>Email:</b>	Tracene.L.Davis@hud.gov

## SPECIFIC PTA QUESTIONS

### 1. Reason for submitting the PTA: New PTA

*Please provide a general description of the project and its purpose so a non-technical person could understand. If this is an updated PTA, please describe what 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.*

This is a reinstatement of a previously approved collection.

The information is basic to the ongoing operations of the Multifamily Housing Service Coordinator Program. It supports statutory requirements and program and management controls that prevent fraud, waste, and mismanagement. The controls must be maintained as long as current grants are in operation. Section 671 of the Housing and Community Development Act of 1992 refers to applications for Service Coordinator grants as follows: "Application and Selection - The Secretary shall provide for the form and manner of applications for grants under this section and for selection of applicants to receive such grants."

The Department of Housing and Urban Development (herein referred to as the Department/HUD) has issued an interim new regulation for the Service Coordinator program, 24 CFR Part 892. Since the rule is not yet final, the information presented in this paperwork burden package is required, for the most part, by administrative decision and written directive. The new 2 CFR part 200, "Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards" will also regulate all existing Service Coordinator grants starting in Fiscal Year (FY) 2016.

Field Office staff use the annual Summary Budget (HUD-91186) and the Annual Program Budget (form HUD-91178-A) to assure that grant funds are being used properly.

HUD Field staff will review HUD-50080-SCMF, LOCCS Payment Voucher/Expense Report, in order to monitor the proper use of grants funds. The form is used by HUD to protect disbursement data from fraudulent actions, and to safeguard the Line of Credit Control System (LOCCS) from unauthorized access. The data reported will allow the Field staff to track expenses and drawdown of funds for eligible activities at intervals within the grant term.

HUD Field staff will review the HUD-92456, Semi-Annual Performance Report and Standard for Success (SfS), to evaluate the effectiveness and efficacy of grant-funded activities.

Headquarters program staff use Annual Reports to compile annual program data for internal and external reports when requested.

<p><b>2. Does this system employ the following technologies?</b>  <i>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.</i></p>	<p><input type="checkbox"/> Social Media</p> <p><input checked="" type="checkbox"/> Web portal<sup>1</sup> (e.g., SharePoint)</p> <p><input type="checkbox"/> Contact Lists</p> <p><input type="checkbox"/> Public website (e.g. A website operated by HUD, contractor, or other organization on behalf of the HUD)</p> <p><input checked="" type="checkbox"/> None of these</p>
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<p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b>  <i>Please check all that apply.</i></p>	<p><input type="checkbox"/> This program collects no personally identifiable information<sup>2</sup></p> <p><input type="checkbox"/> Members of the public</p> <p><input type="checkbox"/> HUD employees/contractors (list programs):</p> <p><input type="checkbox"/> Contractors working on behalf of HUD</p> <p><input type="checkbox"/> Employees of other federal agencies</p> <p><input checked="" type="checkbox"/> Other (e.g. business entity)</p>
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<p><b>4. What specific information about individuals is collected, generated or retained?</b></p>
<p><i>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, 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 date, place of birth, race, religion, weight, activities, geographical indicators, employment information, medial information, education information, financial information) and etc.</i></p> <p>The forms collect the following information:          No personal information is being collected about an individual.</p>

<sup>1</sup> 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.

<sup>2</sup> HUD defines personal information as "Personally Identifiable Information" or PII, which is 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.

<p><b>4(a) Does the project, program, or system retrieve information from the system about a U.S. Citizen or lawfully admitted permanent resident aliens by a personal identifier?</b></p>	<p><input type="checkbox"/> No. Please continue to next question.  <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used:  legal name, EIN, TIN, address, telephone number, email address, signature, grant number, full name, name of contact person, account number, and DUNS number</p>
<p><b>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?</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.  <input type="checkbox"/> 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. Line of Credit Control Systems, (LOCCS, A67) FR 2014-06714</p>
<p><b>4(c) Has the project, program, or system undergone any significant changes since the SORN?</b></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.  <input type="checkbox"/> Yes. If yes, please describe.</p>
<p><b>4(d) Does the project, program, or system use Social Security Numbers (SSN)?</b></p>	<p><input type="checkbox"/> No.  <input checked="" type="checkbox"/> Yes.</p>
<p><b>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</b></p>	<p>The Housing and Community Development Act of 1987, 42 U.S.C. 3543 requires persons applying for a Federally-insured or guaranteed loan to furnish his/her Social Security Number (SSN). HUD must have SSN for identification of records.</p>
<p><b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>	<p>HUD may use your SSN for automated processing of your records and to make requests for information about you and your previous records with other public agencies and private sector sources.</p>
<p><b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b>   <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i></p>	<p><input checked="" type="checkbox"/> No. Please continue to next question.  <input type="checkbox"/> Yes. If a log kept of communication traffic, please answer this question.</p>
<p><b>4(h) If header or payload data<sup>3</sup> is stored in the communication traffic log, please detail the data elements stored.</b></p>	
<p>Click here to enter text.</p>	

<sup>3</sup> 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><b>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</b></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:  Click here to enter text.</p>
<p><b>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</b></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:  Click here to enter text.</p>
<p><b>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</b></p>	<p>Choose an item.  Please describe applicable information sharing governance in place:</p>
<p><b>7. Does the project, program, or system provide role-based training for personnel who have access in addition to annual privacy training required of all HUD personnel?</b></p>	<p><input checked="" type="checkbox"/> No.  <input type="checkbox"/> Yes. If yes, please list:</p>
<p><b>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?</b></p>	<p><input checked="" type="checkbox"/> No. What steps will be taken to develop and maintain the accounting:  <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>
<p><b>9. Is there a FIPS 199 determination?<sup>4</sup></b></p>	<p><input type="checkbox"/> Unknown.  <input checked="" type="checkbox"/> No.  <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>

<sup>4</sup> FIPS 199 is the [Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems](#) and is used to establish security categories of information systems.

**PRIVACY THRESHOLD ANALYSIS REVIEW**

**(TO BE COMPLETED BY PROGRAM PLO)**

<b>Program Office SME:</b>	<b>Alicia Anderson</b>
<b>Date submitted to OPPAD Office:</b>	<b>April 2, 2019</b>
<b>Date submitted to HUD Privacy Branch:</b>	April 2, 2019
<b>Program Privacy Liaison Officer Recommendation:</b> <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)**

<b>HUD Privacy Branch Reviewer:</b>	<b>Cindy Etheridge</b>
<b>Date approved by HUD Privacy Branch:</b>	December 4, 2018
<b>PTA Expiration Date:</b>	Phis PTA will suffice, however, if there are any changes, an update will be required.

**DESIGNATION**

<b>Privacy Sensitive System:</b>	Choose an item. If "no" PTA adjudication is complete.
<b>Category of System:</b>	Choose an item. If "other" is selected, please describe: Click here to enter text.
<b>Determination:</b>	<input checked="" 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 type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) 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.



<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 type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) required. <input 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.	
<b>PIA:</b>	Choose an item. If covered by existing PCLIA, please list: <a href="#">Click here to enter text.</a>
<b>SORN:</b>	Choose an item. If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>
<b>HUD Privacy Branch Comments: Forms that will be used in this collection are: HUD-2530, 91186, HUD -91186-A, SF-424, SF-424-Supp, HUD-2880, SF-LLL, 92456 and 50080.</b> <i>Please describe rationale for privacy compliance determination above.</i>	
<a href="#">Click here to enter text.</a>	

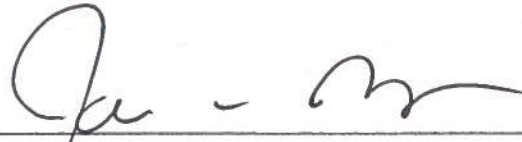
**DOCUMENT ENDORSMENT**

DATE REVIEWED:
PRIVACY REVIEWING OFFICIALS NAME:

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.

  
\_\_\_\_\_  
**Alicia Anderson, Branch Chief**  
**Grants and New Funding Branch**

2/24/18  
Date

  
\_\_\_\_\_  
**John Bravacos**  
**Senior Agency Official for Privacy**  
**Privacy Branch**  
**OFFICE OF ADMINISTRATION**

4/12/19  
Date