

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

PRIVACY THRESHOLD ANALYSIS (PTA)

Personal Financial and Credit Statement

2502-0001

Office of Multifamily Production

November 28, 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 G. Bravacos, Senior Agency Official for Privacy
Privacy Branch
U.S. Department of Housing and Urban Development

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

Project or Program Name:	OMB 2502-0001, Personal Financial and Credit Statement		
Program:	Office of Housing		
CSAM Name (if applicable):	Development Application Processing System (DAP)	CSAM Number (if applicable):	N/A
Type of Project or Program:	Form or other Information Collection	Project or program status:	Existing
Date first developed:	Unknown	Pilot launch date:	N/A
Date of last PTA update:	N/A (Last IPA done, 2015)	Pilot end date:	N/A
ATO Status (if applicable)	Not started	ATO expiration date (if applicable):	N/A

PROJECT OR PROGRAM MANAGER

Name:	Sylvia S. Chatman		
Office:	Office of Multifamily Production	Title:	Production Specialist
Phone:	202-402-2994	Email:	Sylvia.s.chatman@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Robert C. Anderson, Program Systems Management		
Phone:	202-402-3978	Robert.C.Anderson@hud.gov	Click here to enter text.

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: New PTA

Required as a part of renewal request to OMB for existing information collection. The purpose of the form HUD-92417, is as follows: *

Form HUD-92417, Personal and Financial Credit Statement, is a part of the credit investigation during the Site Appraisal and Market Analysis (SAMA)-Feasibility stage for non-profit sponsors/mortgagors and housing consultants and during the commitment stage in for all other sponsors/mortgagors, principals of the mortgagor entity, and general contractors. FHA-approved lenders and HUD personnel use the information to analyze the financial capacity, reputation, experience, and the ability of the project sponsor to develop a successful project, and to determine if the sponsor has sufficient financial resources to complete and maintain the property.

Form HUD-92417 is used only for individuals and is completed in conjunction with the basic application form, HUD-92013 (OMB Control Number 2502-0029) as a required exhibit. The information obtained is the minimum required to decide of the financial and credit status of the respondent. The respondents are individuals of business entities, non-profit entities, corporations, and general contractors. The Privacy Act Notice Statement, therefore, is applicable.

Corporate or partnership mortgagors do not use the form and are not a part of this information collection. Corporate or partnership mortgagors submit balance sheets, income and expense statements, and other financial reports to demonstrate credit worthiness (OMB control number -2502-0029).

*All forms under the Office of Multifamily Production are stored on HUDclips in the HUD@work network.

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 the HUD)
- None of these

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.

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):
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?

The respondents are individuals of business entities, non-profit entities, corporations, and general contractors. The Privacy Act Notice Statement, therefore, is applicable. Providing the SSN is mandatory by the Borrower(s). SSN and Signature is required for spouse of married individuals. (Form HUD-92417, page 4). It will be used as a minimum, to decide of the financial and credit status of the Borrower.

HUD is authorized to collect this information by P. L. 479.48, Stat.1246, 12USC 1701 et. seq.; and the Housing and Community Development Act of 1987, 42 USC 3543, to collect Social Security Number (SSN).

Information is collected from individuals of business entities, non-profit entities, corporations, and general contractors as authorized under P. L. 479.48, Stat.1246, 12USC 1701 et. seq.; and the Housing and Community Development Act of 1987, 42 USC 3543.

The form HUD-2530, previous participation certification under the OMB #2502-0118 does not relate to the financial document/form HUD-92417. The form 2530 is a separate loan application exhibit that is reviewed by Asset Management to verify the list of projects a principal may have. The 'Previous Participation Certification' is the document, which contains eight statements that catches all changes that may have occurred with the Borrower(s). This certification is signed by the borrower with all the legal authority. The information requested in the form (HUD-2530) to determine if you meet the standards established to ensure that all controlling participants in HUD projects will honor their legal, financial and contractual obligations and are acceptable risks from the underwriting standpoint of an insurer, lender or governmental agency. The form 2530 is an exhibit that accompanies multifamily loan applications.

The following information is collected, generated and retained:

Project Name	Financial Data concerning Assets
Project Number	Social Security Numbers
Project Location	

² 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.

Name and address of Person	
<p>4(a) Does the project, program, or system retrieve information from the system about 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??</p>	<p>No Please continue to next question.</p> <p><input type="checkbox"/> No. Please continue to next question. <input checked="" type="checkbox"/> Yes. If yes, please list all personal identifiers used:</p> <p>Project Name Project Number Project Location Name and address of Person Financial Data concerning Assets Social Security Numbers</p>
<p>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?</p>	<p><input type="checkbox"/> No. Please continue to next question. <input checked="" 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</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 next question. <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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes.</p>
<p>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</p>	<p>HUD is authorized to collect this information by P. L. 479.48, Stat.1246, 12USC 1701 et. seq.; and the Housing and Community Development Act of 1987, 42 USC 3543, to collect Social Security Number (SSN).</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>SSNs are collected and used to assure the true identity of the applicant and to determine their financial and credit worthiness and stability as qualified by the program.</p>
<p>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</p> <p><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>

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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: Form HUD-92417 is used only for individuals and is completed in conjunction with the basic application form, HUD-92013 (OMB Control Number 2502-0029) as a required exhibit.
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: Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	Choose an item. N/A 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 annual privacy training required of all HUD personnel?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:
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?	<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:
9. Is there a FIPS 199 determination?⁴	<input checked="" type="checkbox"/> Unknown.

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.

⁴ 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.

	<input type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High
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PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Thomas A. Bernaciak, Director, Technical Support
Date submitted to Program Privacy Office:	September 19, 2018
Date submitted to HUD Privacy Branch:	September 19, 2018
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:	Cindy Etheridge
Date approved by HUD Privacy Branch:	November 30, 2018
PTA Expiration Date:	This PTA will suffice at this time; however, if there are any significant modifications it would need to be revised and will required an update.

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 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 checked="" 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.	
PIA:	Choose an item. If covered by existing PCLIA, 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: HUD form 92457 (Land Survey) is included in this collection. <i>Please describe rationale for privacy compliance determination above. Currently there are efforts to replace the Development Application Processing (DAP) system with a new system, to be call Application Underwriting Support System (AUSS). DAP is expected to be decommissioned by March 2020. There is a PIA and a SORN 2016 on file for DAP. A new PIA and SORN will be completed on AUSS in 2020..</i>	
Click here to enter text.	

DOCUMENT ENDORSMENT

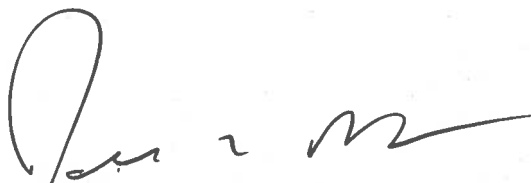
DATE REVIEWED:
PRIVACY REVIEWING OFFICIALS NAME:

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.



2/28/18
Date

Thomas A. Bernaciak, Director, Office of Technical Support



3/28/19
Date

John G. Bravacos

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION