

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Indian Community Development Block
Grant Program**

**Public and Indian Housing,
Office of Native American Programs.
Office of Loan Guarantee**

Instruction & Template

May 1, 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 Impact Assessment (PIA) 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:

Marcus Smallwood, Acting, Chief Privacy Officer
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 PIA or SORN is required, the HUD Privacy Branch will send you a copy of the PIA and SORN templates to complete and return.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Indian Community Development Block Grant Program		
Program:	Public and Indian Housing (PIH)		
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:	Existing
Date first developed:	January 1, 1995	Pilot launch date:	July 1, 1995
Date of last PTA update:	January 6, 2014	Pilot end date:	October 1, 1996
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Frederick J. Grier		
Office:	Office of Grants Management	Title:	Director
Phone:	202-402-5186	Email:	Frederick.J.Grier@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	N/A		
Phone:	N/A	Email:	N/A

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Renewal 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.

Title I of the Housing and Community Development Act of 1974 allows for applications of funding for the development of decent housing, suitable living environment and economic opportunities for low and moderate-income persons. The Indian Community Development Block Grant (ICDBG) program for Indian tribes and Alaska Native villages requires applicants to submit information to enable HUD to select the best projects for funding during annual competitions. Eligible applicants are invited to submit grant applications through a Notice of Funding Availability which is posted on www.grants.gov.

Required information is submitted through Application for Federal Assistance (SF-424), Applicant/Recipient Disclosure/Update Report (HUD-2880), Acknowledgment of Application Receipt (HUD-2993), Cost Summary (HUD-4123), and Implementation Schedule (HUD-4125). ICDBG recipients are also required to submit periodic information through the Federal Financial Report (SF-425) and the Contract and Subcontract.

There have been no changes to the project since the last PTA.

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.

<p>3. From whom does the Project or Program collect, maintain, use, or disseminate information? Please check all that apply.</p>	<p><input checked="" type="checkbox"/> This program collects no personally identifiable information²</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 type="checkbox"/> Other (e.g. business entity)</p>
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<p>4. What specific information about individuals is collected, generated or retained?</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 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 date, place of birth, race, religion, weight, activities, geographical indicators, employment information, medial information, education information, financial information) and etc.</i></p> <p>The only information collected about individuals are the full names of the persons authorized to execute grant applications, grant agreements, and other documents required by the ICDBG program.</p>	
<p>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><input checked="" type="checkbox"/> No. Please continue to next question.</p> <p><input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</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 checked="" type="checkbox"/> No. Please continue to next question.</p> <p><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</p>

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.

<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>Applicants for Federal assistance are required by the ICDBG Notice of Funding Availability to submit form SF-2880 that collects the name and Social Security Number or Employer ID Number of the person authorized to submit the application on behalf of the tribe. HUD uses this information to identify apparent or potential conflicts of interest.</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</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>
<p>4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.</p>	
<p>N/A</p>	

<p>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>	<p><input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: Form SF-2880 collects the name and Social Security Number or Employer ID Number of the person authorized to submit the application on behalf of the tribe.</p>
<p>6. Does this project, program, or system connect, receive, or share PII with any external (non-HUD) partners or systems?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please list:</p>

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.

	Click here to enter text.
6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?	N/A
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 type="checkbox"/> No. What steps will be taken to develop and maintain the accounting: <input checked="" type="checkbox"/> Yes. In what format is the accounting maintained: List.
9. Is there a FIPS 199 determination?⁴	<input type="checkbox"/> Unknown. <input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High

**PRIVACY THRESHOLD ANALYSIS REVIEW
(TO BE COMPLETED BY PROGRAM PLO)**

Program Privacy Liaison Reviewer:	Click here to enter text.
Date submitted to Program Privacy Office:	Click here to enter a date.

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.

Date submitted to HUD Privacy Branch:	Click here to enter a date.
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:	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.

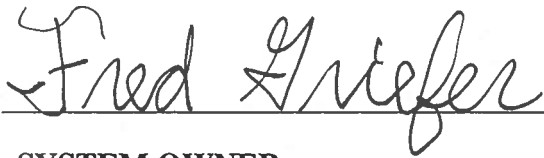
DESIGNATION

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:	<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 type="checkbox"/> Privacy Impact Assessment (PIA) 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 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 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.




Date

SYSTEM OWNER

Frederick J. Grier, Director

ONAP Office of Grants Management

CHIEF PRIVACY OFFICER

Date

<<INSERT NAME/TITLE>>

OFFICE OF ADMINISTRATION