

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

PRIVACY THRESHOLD ANALYSIS (PTA)

Multifamily Financial Management Template

Multifamily Housing

Instruction & Template

2502-0551

June 14, 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

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:	Multifamily Financial Management Template		
Program:	Office of Housing		
CSAM Name (if applicable):	Financial Assessment Subsystem - FHA	CSAM Number (if applicable):	1008
Type of Project or Program:	IT System	Project or program status:	Operational
Date first developed:	January 1, 1999	Pilot launch date:	Click here to enter a date.
Date of last PTA update:	May 15, 2015	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Complete	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Darrall Griffin		
Office:	PIH Real Estate Assessment Center	Title:	Program Manager, Financial Assessment Subsystem-FHA
Phone:	202-475-8749	Email:	Darrall.A.Griffin@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Dallas Blair		
Phone:	202-475-8699	Email:	Dallas.C.Blair@hud.gov

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 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.

In accordance with the Department’s Uniform Financial Reporting Standards (UFRS) regulation, 24 CFR Part 5, owners of certain HUD-insured and HUD-assisted properties are required to submit annual financial statements electronically to HUD via the Internet in the HUD-prescribed format and chart of accounts, and in accordance with the generally accepted accounting principles (GAAP). The Department uses this information to monitor the owner/agent compliance with regulatory requirements and to assess fiscal performance. This information is submitted either by the property owner/agent or the auditor.

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

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)

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, 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.

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, 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, medical information, education information, financial information) and etc.

Full name, business address and TIN of the property owner/agent or auditor

<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. <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. <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>
<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. NOT APPLICABLE <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. <input type="checkbox"/> Yes.</p>
<p>4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:</p>	<p>Click here to enter text.</p>
<p>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</p>	<p>Click here to enter text.</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>	

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

Click here to enter text.

NOT APPLICABLE

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: 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. NOT APPLICABLE 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 type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: <i>OCIO role-based training for individuals with the following roles:</i> Contracting Officer, Contracting Officer Representative, Authorizing official, Information Security Officer, System Owner, System Administrator
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: NOT APPLICABLE <input type="checkbox"/> Yes. In what format is the accounting maintained:
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 type="checkbox"/> High

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.

<p>Privacy and Civil Liberties Impact Assessment (PCLIA) required. System of Records Notice (SORN) required.</p> <p>Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.</p> <p>A Records Schedule may be required. Contact your program Records Officer.</p>	
PIA:	<p>System covered by existing PIA</p> <p>If covered by existing PCLIA, please list: Click here to enter text.</p>
SORN:	<p>Choose an item.</p> <p>If covered by existing SORN, please list: Click here to enter text.</p>
<p>HUD Privacy Branch Comments:</p> <p><i>Please describe rationale for privacy compliance determination above.</i></p>	
<p>Click here to enter text.</p>	

DOCUMENT ENDORSEMENT

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.

DARRALL

Digitally signed by DARRALL

GRIFFIN

GRIFFIN

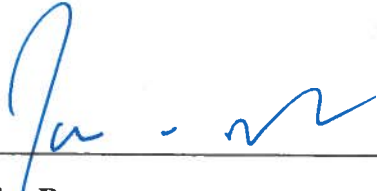
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SYSTEM OWNER

Date

Darrall Griffin
Director, Financial Assessment FHA
Real Estate Assessment Center



8/2/18
Date

John Bravacos
Senior Agency Official for Privacy
Privacy Branch
OFFICE OF ADMINISTRATION