

# Departmental Clearance & Approval Record

Office of Administration

|   |                          |   |  |
|---|--------------------------|---|--|
| 1. Job Control Number(s)<br><b>2506-new</b> | 2. Classification Number | 3. Type of Action<br><input checked="" type="checkbox"/> Clearance <input type="checkbox"/> Final Clearance<br><input type="checkbox"/> Reclearance <input type="checkbox"/> Approval | 4. Deadline Date<br><b>July 23, 2018</b> |
|---|--------------------------|---|--|

5. Complete Title  
**Housing Trust Fund (HTF)**

|  |   |
|--|---|
| 6. Principal Audience or User<br><input checked="" type="checkbox"/> HUD Staff<br><input checked="" type="checkbox"/> Program Participants | 6a. Proposed Distribution (spell-out, do not use codes) |
|--|---|

|  |  |   |                                 |
|--|--|---|---------------------------------|
| 7. Person most familiar with the Document<br><b>Quinn Warner</b> | 7a. Organization Code / Office<br><b>CPD/DGH</b> | 7b. Telephone Number<br><b>202.402.1401</b> | 7c. Room Number<br><b>10178</b> |
|--|--|---|---------------------------------|

8. Type of Document

|  |  |  |  |  |  |
|--|--|--|--|--|--|
| <input type="checkbox"/> New Handbook    | <input type="checkbox"/> Handbook Revision | <input type="checkbox"/> New Form      | <input type="checkbox"/> Federal Register Notice | <input type="checkbox"/> Regulation        | <input type="checkbox"/> Other (specify) |
| <input type="checkbox"/> Handbook Change | <input type="checkbox"/> Notice            | <input type="checkbox"/> Form Revision | <input type="checkbox"/> Publication             | <input type="checkbox"/> Special Directive | <b>PRA</b>                               |

9. Mark the boxes for the organization(s) reviewing this document. (Specify under "Other" the HQ/Field staff components within the reviewing offices, e.g. admin officers)

|   |   |                              |                                |  |
|---|---|------------------------------|--------------------------------|--|
| <input checked="" type="checkbox"/> ADMIN | <input checked="" type="checkbox"/> OIG | <input type="checkbox"/> FPM | <input type="checkbox"/> FHEO  | <input type="checkbox"/> Public Affairs      |
| <input checked="" type="checkbox"/> OGC   | <input checked="" type="checkbox"/> PDR | <input type="checkbox"/> HSG | <input type="checkbox"/> EEO   | <input type="checkbox"/> Lead Hazard Control |
| <input checked="" type="checkbox"/> CIO   | <input checked="" type="checkbox"/> CPD | <input type="checkbox"/> PIH | <input type="checkbox"/> CIR   | <input type="checkbox"/> OCHCO               |
| <input checked="" type="checkbox"/> CFO   | <input type="checkbox"/> GNMA           | <input type="checkbox"/> CPO | <input type="checkbox"/> OSDBU | <input type="checkbox"/> OTHER               |

|  |  |  |   |
|--|--|--|---|
| 10. Front-End Risk Analysis  | 11. Information Collection Requirements (Paperwork Reduction Act)  | 12. Impact on Small Entities (Regulatory Flexibility Act)  | 13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Policy Act)       |
| <input type="checkbox"/> Completed<br><input type="checkbox"/> In Process<br><input type="checkbox"/> Not Needed | <input type="checkbox"/> Completed<br><input type="checkbox"/> In Process<br><input type="checkbox"/> Not Needed | <input type="checkbox"/> Completed<br><input type="checkbox"/> In Process<br><input type="checkbox"/> Not Needed | <input type="checkbox"/> EIS Required<br><input type="checkbox"/> FONSI Required<br><input type="checkbox"/> FONSI Not Needed |

| 14. Organization | Signature & Title of Clearing/ Approving Official  | Date    | Concur (no comments) | Concur (comments attached) | Non-Concur (comments attached) | No Position (NP) | No Need to Review (NR) |
|------------------|--|---------|----------------------|----------------------------|--------------------------------|------------------|------------------------|
| <b>CPD</b>       | <i>David W. Adams</i><br>Neal Rackleff, Assistant Secretary for Community Planning and Development | 6/18/18 |                      |                            |                                |                  |                        |
| <b>ADM</b>       | <i>John Bravacos</i><br>John Bravacos, Senior Agency Official for Privacy, Privacy Branch          | 2/28/19 | <b>X</b>             |                            |                                |                  |                        |
|                  |  |         |                      |                            |                                |                  |                        |
|                  |  |         |                      |                            |                                |                  |                        |

15. List HQ/Field components involved in developing the document (drafts, discussions, etc.)

16. Comments:

|  |   |                                  |
|--|---|----------------------------------|
| 17. Return this record to:<br><b>Urnell Johnson-Spears</b> | 17a. Telephone Number:<br><b>202.402.4376</b> | 17b. Room Number:<br><b>7233</b> |
|--|---|----------------------------------|

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## Instructions

1. Assigned by the originating office's Directives Management Officer (DMO); use the last two digits of the calendar year plus a sequential number plus the office acronym (e.g., 96-01 ADM).
2. For a directive, the proposed three- or four-digit subject classification number which may include a sequential number, revision number, and change number.
3. Self-explanatory.
4. Requests for extensions must be made before the deadline date.
5. The complete title as it will appear on the document.
6. Self-explanatory.
  - 6a. Give description of the proposed distribution, e.g., to HUD Administrative Officers, to Public Housing Agencies, etc. Do not use codes.
7. The person primarily responsible for the document who can discuss proposed modifications.
8. Self-explanatory.
9. Self-explanatory.
10. See Handbook 1840.1, Departmental Management Control Program (formerly Fraud Vulnerability Assessment).
11. See Handbook 2400.3, Reports Analysis and Clearance Process.
12. See Public Law 96-354, Regulatory Flexibility Act.
13. See 24 CFR 50 on compliance with the National Environmental Policy Act.
14. Use for Primary Organization Head (POH) approval to put the document into clearance and, later, to publish the document. Also used for the POH sign-off of reviewing offices.
15. Self-explanatory.
16. Explanations, special instructions, etc.
17. Self-explanatory.

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

**PRIVACY THRESHOLD ANALYSIS (PTA)**

**HOUSING TRUST FUND**

**COMMUNITY PLANNING AND DEVELOPMENT  
OFFICE OF AFFORDABLE HOUSING PROGRAMS**

**Instruction & Template  
1633: 2506-New**

**July 11, 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>    | Housing Trust Fund (HTF)                               |   |          |
| <b>Program:</b>                    | Community Planning and Development (CPD)               |   |          |
| <b>CSAM Name (if applicable):</b>  | C04 – CPD Integrated Disbursement & Information System | <b>CSAM Number (if applicable):</b>         | 988      |
| <b>Type of Project or Program:</b> | Program  | <b>Project or program status:</b>           | Existing |
| <b>Date first developed:</b>       | January 30, 2015                                       | <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>  | Not started  | <b>ATO expiration date (if applicable):</b> | n/a      |

**PROJECT OR PROGRAM MANAGER**

|                |                  |               |   |
|----------------|------------------|---------------|---|
| <b>Name:</b>   | Virginia Sardone |               |   |
| <b>Office:</b> | 10168            | <b>Title:</b> | Director, Office of Affordable Housing Programs |
| <b>Phone:</b>  | 202-708-2684     | <b>Email:</b> | Virginia.Sardone@hud.gov                        |

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

|               |                |               |                          |
|---------------|----------------|---------------|--------------------------|
| <b>Name:</b>  | James Stansell |               |                          |
| <b>Phone:</b> | (202) 402-2158 | <b>Email:</b> | James.W.Stansell@hud.gov |

## SPECIFIC PTA QUESTIONS

|   |
|---|
| <b>1. Reason for submitting the PTA: Choose an item.</b>  |
| <p><i>The Housing Trust Fund is a formula grant that provides states with funding for affordable housing projects. The program uses the Integrated Disbursement and Information System (IDIS) to collect project information and manage the grants. This is being prepared as part of a PRA submission number OMB-2506.</i></p> |

|  |   |
|--|---|
| <p><b>2. Does this system employ the following technologies?</b><br/> <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 type="checkbox"/> None of these</p> |
|--|---|

|   |  |
|---|--|
| <p><b>3. From whom does the Project or Program collect, maintain, use, or disseminate information?</b><br/> <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 checked="" 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> |
|---|--|

|  |
|--|
| <b>4. What specific information about individuals is collected, generated or retained?</b> |
|--|

<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><i>The Housing Trust Fund uses the Integrated Disbursement and Information System (IDIS) to capture the name and street address of certain individuals who live in HTF assisted units.</i></p>                                    |  |
| <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 checked="" type="checkbox"/> No. Please continue to next question.<br/> <input type="checkbox"/> Yes. If yes, please list all personal identifiers used:</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.<br/> <input type="checkbox"/> Yes.</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.<br/> <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 checked="" type="checkbox"/> No.<br/> <input 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>n/a</p>   |
| <p><b>4(f) If yes, please describe the uses of the SSNs within the project, program, or system:</b></p>  | <p>n/a</p>   |
| <p><b>4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure?</b></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.<br/> <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>n/a</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>5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?</p>   | <p><input checked="" type="checkbox"/> No.<br/> <input type="checkbox"/> Yes. If yes, please list:<br/> Click here to enter text.</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.<br/> <input type="checkbox"/> Yes. If yes, please list:<br/> Click here to enter text.</p>  |
| <p>6(a) Is this external sharing pursuant to new or existing information sharing access agreement (MOU, MOA, etc.)?</p>  | <p>Choose an item.<br/> Please describe applicable information sharing governance in place: n/a</p>  |
| <p>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?</p>                     | <p><input checked="" type="checkbox"/> No.<br/> <input type="checkbox"/> Yes. If yes, please list:</p>   |
| <p>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?</p> | <p><input checked="" type="checkbox"/> No. (System Does Not contain PII) What steps will be taken to develop and maintain the accounting:<br/> <input type="checkbox"/> Yes. In what format is the accounting maintained:</p>  |
| <p>9. Is there a FIPS 199 determination?<sup>4</sup></p>   | <p><input type="checkbox"/> Unknown.<br/> <input type="checkbox"/> No.<br/> <input checked="" type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality:<br/> <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity:<br/> <input type="checkbox"/> Low <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability:<br/> <input type="checkbox"/> Low <input checked="" 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 Privacy Liaison Reviewer:</b>   | James Stansell    |
| <b>Date submitted to Program Privacy Office:</b>   | February 28, 2019 |
| <b>Date submitted to HUD Privacy Branch:</b>   | February 28, 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>         | Cindy Etheridge   |
| <b>Date approved by HUD Privacy Branch:</b> | February 28, 2019 |
| <b>PTA Expiration Date:</b>                 | February 28, 2019 |

**DESIGNATION**

|                                  |  |
|----------------------------------|--|
| <b>Privacy Sensitive System:</b> | Choose an item. If "no" PTA adjudication is complete.  |
| <b>Category of System:</b>       | Choose an item.<br>If "other" is selected, please describe: Click here to enter text.  |
| <b>Determination:</b>            | <input checked="" type="checkbox"/> PTA sufficient at this time.<br><input type="checkbox"/> Privacy compliance documentation determination in progress.<br><input type="checkbox"/> New information sharing arrangement is required.<br><input type="checkbox"/> HUD Policy for Computer-Readable Extracts Containing Sensitive PII applies.<br><input checked="" type="checkbox"/> Privacy Act Statement required.<br><input type="checkbox"/> Privacy and Civil Liberties Impact Assessment (PCLIA) required.<br><input checked="" type="checkbox"/> System of Records Notice (SORN) required.<br><input type="checkbox"/> Paperwork Reduction Act (PRA) Clearance may be required. Contact your program PRA Officer.<br><input type="checkbox"/> A Records Schedule may be required. Contact your program Records Officer. |
| <b>PIA:</b>                      | Choose an item.  |

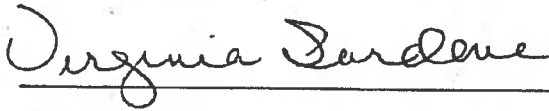
|   |  |
|---|--|
|   | If covered by existing PCLIA, please list: <a href="#">Click here to enter text.</a> |
| <b>SORN:</b>  | System covered by existing SORN  |
|   | If covered by existing SORN, please list: <a href="#">Click here to enter text.</a>  |
| <b>HUD Privacy Branch Comments: HUD forms used in this collection are, : SF-11991, HUD-27055, SF-424 and SF-425</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.



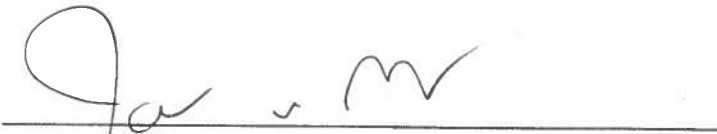
Virginia Sardone - Director  
Office of Affordable Housing Programs

8/14/18  
Date



James Stansell  
Information Systems Security Officer (ISSO)  
Office Of Community Planning & Development  
Systems Development & Evaluation Division

2/28/2019  
Date



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

2/28/2019  
Date

