Departmental Clearance & Approval Record

Office of Administration

1. Job Control Number(s)	2. Classification Number	3. Type of Action	4. Deadline Date
2506-new		[x] Clearance [ ] Final Clearance [ ] Reclearance [ ] Approval	July 23, 2018

5. Complete Title

Housing Trust Fund (HTF)

6. Principal Audience or User
[x] HUD Staff
[x] Program Participants

6a. Proposed Distribution (spell-out, do not use codes)

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

8. Type of Document

[ ] New Handbook   [ ] Handbook Revision   [ ] New Form   [ ] Federal Register Notice   [ ] Regulation   [ ] Other (specify)
[ ] Handbook Change   [ ] Notice   [ ] Form Revision   [ ] Publication   [ ] Special Directive   **PRA**

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

[X] ADMIN	[X] OIG	[ ] FPM	[ ] FHEO	[ ] Public Affairs
[X] OGC	[X] PDR	[ ] HSG	[ ] EEO	[ ] Lead Hazard Control
[X] CIO	[x] CPD	[ ] PIH	[ ] CIR	[ ] OCHCO
[X] CFO	[ ] GNMA	[ ] CPO	[ ] OSDBU	[ ] OTHER _____

10. Front-End Risk Analysis

[ ] Completed
[ ] In Process
[ ] Not Needed

11. Information Collection Requirments (Paperwork Reduction Act)

[ ] Completed
[ ] In Process
[ ] Not Needed

12. Impact on Small Entities (Regulatory Flexibility Act)

[ ] Completed
[ ] In Process
[ ] Not Needed

13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Polciy Act)

[ ] EIS Required
[ ] FONSI Required
[ ] 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)
CPD	DAVID WOLF, Acting — Neal Rackleff, Assistant Secretary for Community Planning and Development	6/18/18					
ADM	John Bravacos, Senior Agency Official for Privacy, Privacy Branch	2/28/19	X				

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

16. Comments:

17. Return this record to:	17a. Telephone Number:	17b. Room Number
Urnell Johnson-Spears	202.402.4376	7233

ref. Handbook 000.2   form **HUD-22** (5/2016)

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

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:	Housing Trust Fund (HTF)		
Program:	Community Planning and Development (CPD)		
CSAM Name (if applicable):	C04 – CPD Integrated Disbursement & Information System	**CSAM Number (if applicable):**	988
Type of Project or Program:	Program	**Project or program status:**	Existing
Date first developed:	January 30, 2015	**Pilot launch date:**	n/a
Date of last PTA update:	n/a	**Pilot end date:**	n/a
ATO Status (if applicable)	Not started	**ATO expiration date (if applicable):**	n/a

PROJECT OR PROGRAM MANAGER

Name:	Virginia Sardone		
Office:	10168	**Title:**	Director, Office of Affordable Housing Programs
Phone:	202-708-2684	**Email:**	Virginia.Sardone@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	James Stansell		
Phone:	(202) 402-2158	**Email:**	James.W.Stansell@hud.gov

SPECIFIC PTA QUESTIONS

1. Reason for submitting the PTA: Choose an item.
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.

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 portal[1] (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 information[2] ☒ 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?

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[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.

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.

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?	☒ No. Please continue to next question. ☐ Yes. If yes, please list all personal identifiers used:
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?	☒ No. Please continue to next question. ☐ Yes.
4(c)Has the project, program, or system undergone any significant changes since the SORN?	☒ No. Please continue to next question. ☐ Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	☒ No. ☐ Yes.
4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	n/a
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	n/a
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? *For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?*	☒ No. Please continue to next question. ☐ Yes. If a log kept of communication traffic, please answer this question.
4(h) If header or payload data[3] is stored in the communication traffic log, please detail the data elements stored.	
n/a	

[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.

5. Does this project, program, or system connect, receive, or share PII with any other HUD programs or systems?	☒ No. ☐ 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?	☒ No. ☐ 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. Please describe applicable information sharing governance in place: 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?	☒ No. ☐ 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?	☒ No. (System Does Not contain PII) What steps will be taken to develop and maintain the accounting: ☐ Yes. In what format is the accounting maintained:
9. Is there a FIPS 199 determination?[4]	☐ Unknown. ☐ No. ☒ Yes. Please indicate the determinations for each of the following: Confidentiality: ☐ Low ☒ Moderate ☐ High Integrity: ☐ Low ☒ Moderate ☐ High Availability: ☐ Low ☒ Moderate ☐ High

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[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.

PRIVACY THRESHOLD ANALYSIS REVIEW

(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	James Stansell
Date submitted to Program Privacy Office:	February 28, 2019
Date submitted to HUD Privacy Branch:	February 28, 2019
Program Privacy Liaison Officer Recommendation: *Please include recommendation below, including what new privacy compliance documentation is needed.* 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:	February 28, 2019
PTA Expiration Date:	February 28, 2019

DESIGNATION

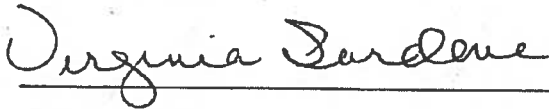|	
Privacy Sensitive System:	Choose an item. If "no" PTA adjudication is complete.
Category of System:	Choose an item. If "other" is selected, please describe: Click here to enter text.
Determination:	X☐ PTA sufficient at this time. ☐ Privacy compliance documentation determination in progress. ☐ New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

HUD Privacy Branch Comments: HUD forms used in this collection are, : SF-11991, HUD-27055, SF-424 and SF-425
Please describe rationale for privacy compliance determination above.
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.
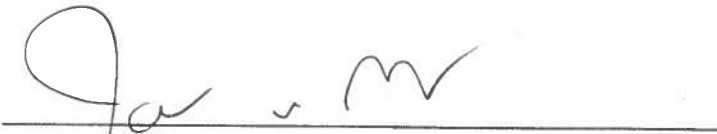
Virginia Sardone   8/14/18
_____   **Date**

Virginia Sardone - Director
Office of Affordable Housing Programs

James W. Stansell   2/28/2019
_____   **Date**

James Stansell

Information Systems Security Officer (ISSO)

**Office Of Community Planning & Development
Systems Development & Evaluation Division**

John Bravacos   2/28/2019
_____   **Date**

John Bravacos

Senior Agency Official for Privacy

**Privacy Branch
OFFICE OF ADMINISTRATION**