

Departmental Clearance & Approval Record

U.S. Department of Housing and Urban Development
Office of Administration

Note to Clearing Offices: If your response has not been received by the Deadline Date, the Originating Office may proceed without it.

1. Job Control Number(s) 2502-0302	2. Classification Number	3. Type of Action <input checked="" type="checkbox"/> Clearance <input type="checkbox"/> Final Clearance <input type="checkbox"/> Reclearance <input type="checkbox"/> Approval	4. Deadline Date 02/09/2018
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5. Complete Title

Local Appeals to Single-Family Mortgage Limits

6. Principal Audience or User <input checked="" type="checkbox"/> HUD Staff <input checked="" type="checkbox"/> Program Participants	6a. Proposed Distribution (spell-out, do not use codes)
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7. Person most familiar with the Document Jim Sorrentino	7a. Organization Code / Office HUPH	7b. Telephone Number Phone: 202-402-2121	7c. Room Number 9266
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8. Type of Document

New Handbook Handbook Revision New Form Federal Register Notice Regulation Other (specify)
 Handbook Change Notice Form Revision Publication Special Directive OMB Info Collection

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)

ADM GNMA PIH Chief Proc. Ofcr. S/Departmental EEO CIR Public Affairs Enf. Ctr.
 CPD H OGC CFO S/Labor Relations S/SDBU Chief Information Officer
 ADSFM IG PD&R FHEO S/Lead Hazard Control REAC PECO Other

10. Front-End Risk Analysis <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed	11. Information Collection Requirements (Paperwork Reduction Act) <input type="checkbox"/> Completed <input checked="" type="checkbox"/> In Process <input type="checkbox"/> Not Needed	12. Impact on Small Entities (Regulatory Flexibility Act) <input type="checkbox"/> Completed <input type="checkbox"/> In Process <input checked="" type="checkbox"/> Not Needed	13. Finding of No Significant Impact (FONSI) / Environmental Impact Statement (EIS) (National Environmental Policy Act) <input type="checkbox"/> EIS Required <input type="checkbox"/> FONSI Required <input checked="" type="checkbox"/> FONSI Not Needed
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14. Organization	Signature & Title of Clearing/Approving Official	Date	Concur (no comments)	Concur (comments attached)	Non-Concur (comments attached)
ADMIN	John Bravacos, Senior Agency Official for Privacy	3/29/18		JGB	

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

16. Comments:

17. Return this record to Kim N. Sanders	17a. Telephone Number 202-402-3343	17b. Room Number 9120
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Supporting Statement for Paperwork Reduction Act Submissions

Local Appeals to Single-Family Mortgage Limits OMB Control Number 2502-0302

A. JUSTIFICATION

1. In accordance with 24 CFR Sec. 203.18b, any interested party may submit a request for the mortgage limits to be increased in a particular area if they believe that the present limit does not accurately reflect the median house prices in that area. Any request for an increase must be accompanied by sufficient housing sales price data to justify higher limits. Typically, this data includes housing sales data extracted from multiple listing services (MLS) that includes all or nearly all one-family and condominium sales in the area for a specified period of time, deleting all non-arm's length sales and sales involving two or more family units.
2. These requests are usually submitted by housing industry groups, such as homebuilders, real estate professionals, and mortgage lenders. Most often, the housing sales price data is necessary to support a request for a higher mortgage limit that may be obtained from existing local industry sources, such as the MLS.
3. All requests are submitted by mail exclusively to FHA's Santa Ana Homeownership Center (HOC), located in Santa Ana, California.
4. No similar information is available. Each request for appeal of FHA's loan limits contains supporting documentation for a specific jurisdiction, county, township, etc.
5. This information collection will have no significant impact on small businesses or other small entities. Generally, the requests come to HUD from housing industry groups, such as homebuilders, real estate professionals, and mortgage lenders, and not from small entities.
6. This information is collected only when a housing industry group submits an appeal to the current year's loan limit.
7. Special circumstances:
 - respondents are not required to report information more than quarter;
 - respondents are not required to prepare a written response in less than 30 days;
 - respondents are not required to submit more than an original and two copies of any document and are not required to retain records more than three years;
 - respondents are not required to provide a statistical survey;
 - respondents are not required to use statistical data not approved by OMB;
 - respondents are not required to submit proprietary trade secrets or other confidential information.
8. In accordance with 5 CFR 1320.8(d), the agency's notice soliciting public comments was announced in the *Federal Register* on xxxx. (Vol. xx, No. xxx, page xxxxx). The agency received no comments.
9. There are no payments or gifts to respondents.

10. No assurances of confidentiality are provided to respondents.

11. No questions of a sensitive nature are asked of respondents.

12. Estimate of the respondent burden and cost of the collection of information:

Commented [ECH1]: This section requires a confidentiality statement. The Privacy Act of 1974 provides confidentiality for all respondents.

Information Collection	Number of Respondents (Requests from 2014-2017)	Frequency of Response	Responses Per Annum	Burden Hours Per Response	Annual Burden Hours	Hourly Cost	Total Annual Cost
Local Appeals to Mortgage Limits	0	0	0	7	0	\$32.00	\$0

The hourly cost is based on an estimate of the average salary of homebuilders, real estate professionals, and mortgage lenders, of approximately \$65,500 per year.

There are approximately 2,465 FHA-approved lenders, 3,234 counties and an unknown number of real estate professionals and homebuilders. From these entities, no requests for loan limit increases have been received since 2013. This is primarily due to the accuracy of the data and the variety of data sources provided to HUD.

13. There are no additional costs to respondents or record keepers resulting from this information collection.

14. Federal government burden and cost:

Information Collection	Responses Per Annum 2014-2017	Burden Hour Per Response	Annual Hours	Hourly Cost	Total Annual Cost
Local Appeals to Mortgage Limits	0	2	0	\$46.49	\$0

The hourly cost is based on the annual salary of a GS-13/1 employee in the Santa Ana HOC, of \$96,698.

During the past three calendar years, HUD received no requests.

15. Adjustment to line 13 of 83-I: Due to the accuracy and variety of the data HUD uses to set Single Family loan limits, no appeals were submitted from 2014 through 2017.

16. The results of this information collection will not be published.

17. There are no exceptions to the certification statement identified in item 19 of the OMB 83-I.

B. Collections of Information Employing Statistical Methods.

This collection of information does not employ statistical methods.

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

PRIVACY THRESHOLD ANALYSIS (PTA)

Local Appeals to Single Family Loan Limits

**Office of Single Family Program
Development**

2502 0302

March 19, 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:	Application for FHA Insured Mortgage		
Program:	Office of Housing		
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:	December 8, 1983	Pilot launch date:	Click here to enter a date.
Date of last PTA update:	April 6, 2015	Pilot end date:	Click here to enter a date.
ATO Status (if applicable)	Choose an item.	ATO expiration date (if applicable):	Click here to enter a date.

PROJECT OR PROGRAM MANAGER

Name:	Jim Sorrentino		
Office:	SFPD/HMID	Title:	Credit Policy Specialist
Phone:	202-402-3249	Email:	Jim.sorrentino@hud.gov

INFORMATION SYSTEM SECURITY OFFICER (ISSO) (IF APPLICABLE)

Name:	Click here to enter text.		
Phone:	Click here to enter text.	Email:	Click here to enter text.

SPECIFIC PTA QUESTIONS

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

This is a request for renewal of OMB approved collection 2502-0302. Any interested party may submit a request for the mortgage limits to be increased in a particular area if they believe that the present limit does not accurately reflect the higher sales prices in that area. Any request for an increase must be accompanied by sufficient housing sales price data to justify higher limits.

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)

4. What specific information about individuals is collected, generated or retained?

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(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?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please list all personal identifiers used: social security number.
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?	<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
4(c) Has the project, program, or system undergone any significant changes since the SORN?	<input checked="" type="checkbox"/> No. Please continue to next question. <input type="checkbox"/> Yes. If yes, please describe.
4(d) Does the project, program, or system use Social Security Numbers (SSN)?	<input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.
4(e) If yes, please provide the specific legal authority and purpose for the collection of SSNs:	
4(f) If yes, please describe the uses of the SSNs within the project, program, or system:	
4(g) If this project, program, or system is an information technology/system, does it relate solely to infrastructure? <i>For example, is the system a Local Area Network (LAN) or Wide Area Network (WAN)?</i>	<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.
4(h) If header or payload data³ is stored in the communication traffic log, please detail the data elements stored.	
Click here to enter text.	

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.

<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. <input type="checkbox"/> Yes. If yes, please list: 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. <input type="checkbox"/> Yes. If yes, please list: Receives information from Mortgagees</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. Please describe applicable information sharing governance in place:</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. <input type="checkbox"/> Yes.</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. What steps will be taken to develop and maintain the accounting: <input type="checkbox"/> Yes. In what format is the accounting maintained</p>
<p>9. Is there a FIPS 199 determination?⁴</p>	<p><input type="checkbox"/> Unknown. <input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. Please indicate the determinations for each of the following:</p> <p>Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Integrity: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p> <p>Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High</p>

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:	Click here to enter text.
Date submitted to Program Privacy Office:	Click here to enter a date.
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:	Cindy Etheridge
Date approved by HUD Privacy Branch:	March 29, 2018
PTA Expiration Date:	This PTA will suffice, however; if there are any significant changes, an update will be required.

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 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: Per Housing, No HUD forms are associated with this collections. <i>Please describe rationale for privacy compliance determination above.</i>	
Click here to enter text.	

DOCUMENT ENDORSMENT

DATE REVIEWED:

PRIVACY REVIEWING OFFICIALS NAME:

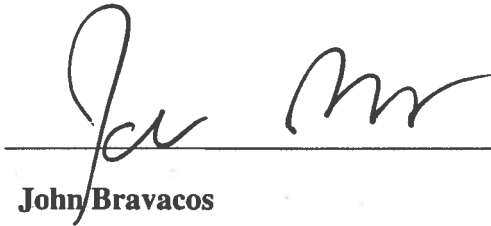
By signing below, you attest that the content captured in this document is accurate and complete and meet the requirements of applicable federal regulations and HUD internal policies.



SYSTEM OWNER

3/29/18
Date

FOR Elissa O. Saunders, Director
SINGLE FAMILY PROGRAM DEVELOPMENT



John Bravacos

3/29/18
Date

Senior Agency Official for Privacy

Privacy Branch

OFFICE OF ADMINISTRATION

