

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

PRIVACY THRESHOLD ANALYSIS (PTA)

**Evaluation of the HUD-DOJ Pay for Success
Permanent Supportive Housing
Demonstration**

Office of Policy Development and Research

September 22, 2017

PRIVACY THRESHOLD ANALYSIS

The Privacy Threshold Analysis (PTA) is a compliance form developed by the Privacy Branch to identify, across the Department, the use of Personally Identifiable Information (PII). 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
- The risks 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 Records Notice (SORN) is required under the Privacy Act of 1974, as amended.

Complete the form and send it to your program Privacy Liaison Officer (PLO). If you have no program Privacy Liaison Officer, please send the PTA to Marcus R. Smallwood, Acting Chief Privacy Officer, Privacy Branch, U.S. Department of Housing and Urban Development, 451 7th Street, SW, Room 10139, Washington, DC 20410 or privacy@hud.gov.

Upon its receipt from your program PLO, the HUD Privacy Branch will review the completed form. If it determines that 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 to the Branch.

PRIVACY THRESHOLD ANALYSIS (PTA)

SUMMARY INFORMATION

Project or Program Name:	Evaluation of the HUD-DOJ Pay for Success Permanent Supportive Housing Demonstration		
Program:	Policy Development and Research (PD&R)		
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:	Development
Date first developed:	September 22, 2017	Pilot launch date:	Click here to enter a date.
Date of last PTA update:	September 22, 2017	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:	Marina L. Myhre		
Office:	PD&R	Title:	Social Science Analyst
Phone:	202-402-5705	Email:	Marina.L.Myhre@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.

Please provide a general description of the project and its purpose so a nontechnical person could understand. If this is an updated PTA, please describe the 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.

The U.S. Departments of Housing and Urban Development (HUD) and Justice (DOJ) entered into an innovative interagency collaboration that combines DOJ's mission to promote safer communities by focusing on the reentry population with HUD's mission to end chronic homelessness. This collaboration resulted in the Pay for Success Permanent Supportive Housing Demonstration with \$8.68M awarded to seven communities to develop supportive housing for persons cycling between the jail or prison systems and the homeless service systems using pay for success (PFS) as a funding mechanism. HUD-DOJ announced seven grantees from across the country in June 2016. The PFS Demonstration grant supports activities throughout the PFS lifecycle, including feasibility analysis, transaction structuring, and outcome evaluation and success payments, with each grantee receiving funds for different stages in the PFS lifecycle. Through the national evaluation, which is funded through an interagency agreement between HUD and DOJ and managed by HUD's Office of Policy Development and Research, HUD-DOJ seek to assess whether PFS is a viable model for scaling supportive housing to improve outcomes for a re-entry population. The main goal of the evaluation is to learn how the PFS model is implemented in diverse settings with different structures, populations, and community contexts. HUD awarded the national evaluation to the Urban Institute in January 2017. There are two data collection tasks where organizational level data and demonstration-related data will be collected: (1) an ongoing time survey (a weekly text survey for organization staff and a monthly text survey for supervisors) and (2) an annual partnership web survey. The time survey will be used to assess staff time spent on development of each PFS project throughout the different lifecycle phases and the partnership survey will be used to document partner perceptions and interactions and community-level changes that may benefit the target population.

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 HUD)
- None of these Urban Institute has their own secure web portal

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 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 checked="" type="checkbox"/> Other (e.g., business entity) Pay for Success Grantee and their staff, and partner organization staff</p>
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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 address, 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 birth, place of birth, race, religion, weight, activities, geographical indicators, employment information, medical information, education information, financial information, etc.

The study team will be collecting the information below as part of the "Evaluation of the HUD-DOJ Pay for Success Permanent Supportive Housing Demonstration" three data collection activities: Weekly Staff Time Surveys, Monthly Supervisor Time Surveys, and an Annual Partnership Survey.

- Weekly Time Survey: Name, business email address, and business cell phone number
- Monthly Time Survey: Name, email address, and business cell phone number
- Annual Partnership Survey: Name, business email address, title/position, number of years in position, number of years working on Pay For Success project

While the cost of PFS transactions are not known, many stakeholders estimate them to be high. This is due, in large part, to the often-lengthy timeline for getting a PFS project through feasibility, structuring, and implementation. A large proportion of the costs incurred by PFS partners is the time spent on PFS-related tasks, which are not be recorded separately by most partner organizations. Therefore, data on time spent will be collected through two complementary time surveys: a weekly text survey and a monthly web-based survey. The surveys will be administered to selected actors in a variety of roles within the organizations participating in the PFS Demonstration. The data will be used for analyses of the time spent

² HUD defines personal information as "personally identifiable information," or PII, as 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.

on PFS transactions among the partners involved over the course of the PFS lifecycle. The weekly survey will ask respondents to report the number of hours they spent on PFS tasks in the previous week. It will be sent to key staff in the organizations who work regularly on PFS tasks. The monthly survey will ask respondents for a summary of hours spent on PFS tasks in the previous month by staff and contractors not covered under the weekly survey. It will be sent to supervisory staff who will have knowledge of the time spent by other staff. The information that is being collected as part of the time surveys survey will be used to collect data on the time spent on the different phases of each Pay For Success project lifecycle.

At the center of its theory of change is that PFS acts as an instrument to bring cross-sector partners together to work collaboratively for better outcomes for a vulnerable population, and to work strategically across silos. There are many reasons a PFS project may not continue through the full lifecycle, but the process itself may still have real benefits to both the partners and the target population the project sought to serve. To understand whether the PFS projects are realizing these types of benefits, we will collect data on community changes through an annual partnership web survey.

The annual partnership survey will be administered to selected partners in a variety of roles within the grantee and partner organizations participating in the PFS Demonstration. The survey will only be available for completion online. The data will be used for analyses of partner perceptions and interactions and community-level changes that may benefit the target population in each Demonstration site.

The information that is being collected through the weekly and monthly time surveys and the annual partnership survey will be reported in the aggregate to present summary, aggregate level information about what the Pay for Success project organizations do, what people they serve, and what their experience and qualifications are. Respondents will be told that their individual responses will be anonymous, de-identified, and will be publicly reported only in the aggregate, and the aggregate data would be scrubbed prior to any data submission from us to HUD. In terms of the Administrative Survey, full names and business email addresses will be destroyed once the service coordinator is contacted for and completes the survey. No names, phone numbers, or business email addresses will be retained or linked to any other data provided by any of the survey respondents. The Urban Institute's Institutional Review Board, which provides an independent, rigorous, human subjects review, has reviewed and approved the methodology and instruments as providing sufficient human subject and privacy protection.

A 60-day Federal Register notice was published on August 25, 2017: "60-Day Notice of Proposed Information Collection: Evaluation of the HUD-DOJ Pay for Success Permanent Supportive Housing Demonstration," Docket No. FR-6003-N-07.

4(a) Does the project, program, or system retrieve information about U.S. Citizens or lawfully admitted permanent resident aliens using personal identifiers?

- No. Please continue to the next question.
- Yes. If yes, please list all personal identifiers used:
- Time Surveys: full name, business email address business cell phone number,
 - Month Time Survey: full name, business email address, business cell phone numbers
 - Administrative Survey: full name, business email addresses, title/position, number of years in position, number of years working on Pay For Success project

<p>4(b) Does the project, program, or system have an existing System of Records Notice (SORN), that has already been published in the <i>Federal Register</i> that covers the information collected?</p>	<p><input checked="" type="checkbox"/> No. Please continue to the next question. <input type="checkbox"/> Yes. If yes, provide the system name and number, and the <i>Federal Register</i> 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 the 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 checked="" type="checkbox"/> No. <input type="checkbox"/> Yes.</p>
<p>4(e) If yes to 4(d), please provide the specific legal authority and purpose for the collection of SSNs.</p>	<p>n.a.</p>
<p>4(f) If yes to 4(d), please describe the uses of the SSNs within the project, program, or system.</p>	<p>n.a.</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 of communication traffic is kept, please provide that information here.</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 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:</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.

<p>6(a) Is this external sharing pursuant to a new or existing information sharing access agreement (MOU, MOA, etc.)?</p>	<p><input checked="" type="checkbox"/> No. <input type="checkbox"/> Yes. If yes, please choose from the dropdown menu below: 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 the annual privacy training required of all HUD personnel?</p>	<p><input type="checkbox"/> No. <input checked="" type="checkbox"/> Yes. If yes, please list: All Urban employees are required to complete an IRB online training course which, among other topics, covers the handling of PII in a research context. Any researcher that will handle any data with PII will also have to sign our staff confidentiality pledge and the HUD-Urban Institute Non-Disclosure Agreement. For the survey data collection, the data will be collected via Qualtrics (an online survey software platform), so no direct contact with individuals will occur and no PII will be collected. Hence, the survey will not require any particular role-based training for survey administration. However, all individuals involved with analysis will also have to sign our confidentiality pledge and ensure data are stored on appropriately encrypted devices.</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: No PII will be collected. <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: Confidentiality: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High Integrity:</p>

⁴ FIPS 199 (Federal Information Processing Standard Publication 199, Standards for Security Categorization of Federal Information and Information Systems) is used to establish security categories of information systems.

	<input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High Availability: <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High
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PRIVACY THRESHOLD ANALYSIS REVIEW
(TO BE COMPLETED BY PROGRAM PLO)

Program Privacy Liaison Reviewer:	Ron Hill
Date submitted to Program Privacy Office:	October 19, 2017
Date submitted to HUD Privacy Branch:	October 19, 2017
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:	Conique key
Date approved by HUD Privacy Branch:	November 8, 2017
PTA Expiration Date:	Every three years

DESIGNATION

Privacy Sensitive System:	No 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 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.

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:

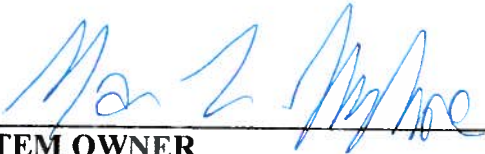
Please describe rationale for privacy compliance determination above.

PTA is sufficient at this time because program is collecting only business identifiers, not personal identifiers. The information collected is not linked or linkable to an individual identity—it links to a position and a business enterprise. If additional information is added to the system or the system links to other HUD systems or external programs not described herein, a new PTA should be completed.

DOCUMENT ENDORSEMENT


DATE REVIEWED: 11/17/2017
PRIVACY REVIEWING OFFICIAL'S NAME: Helen Goff Foster

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
Marina L. Myhre
Policy Development and Research

11/21/17
Date



CHIEF PRIVACY OFFICER
Helen Goff Foster
OFFICE OF ADMINISTRATION

Digitally signed by HELEN
FOSTER
Date: 2017.11.17 16:42:38 -05'00'

Date

